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PPWR Compliance Status Statement

Regulation (EU) 2025/40 on Packaging and Packaging Waste

Dear Customer,

Mutoh Europe nv is actively implementing the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). Our compliance work covers packaging associated with products placed on the European market, including printers, inks, cleaning liquids, consumables, spare parts, and packaging sourced or applied locally by Mutoh Europe.

As part of this process, we are collecting and reviewing the relevant technical and compliance information from our manufacturing organisation and from suppliers of packaging materials used for local packing and repacking activities.

Requirements currently applicable

Regulation (EU) 2025/40 has replaced the former Directive 94/62/EC on packaging and packaging waste. With regard to substances in packaging, Article 5(4) of the PPWR maintains the established restriction previously laid down in Article 11(1) of Directive 94/62/EC.

> The sum of the concentrations of lead, cadmium, mercury and hexavalent chromium in packaging or packaging components shall not exceed 100 mg/kg.

- This heavy-metal concentration limit is therefore not a new substance restriction introduced on 12 August 2026. It is a continuation, within the PPWR framework, of a packaging requirement that already applied under the previous Packaging and Packaging Waste Directive.
- Based on the documentation currently available from our manufacturing organisation and packaging suppliers, Mutoh Europe has not identified information indicating non-compliance with this requirement for the packaging concerned.

Progressive implementation

The PPWR introduces its requirements progressively over a number of years. These instruments are being adopted progressively by the European Commission between 12 August 2026 and 12 February 2030, in line with the timetable set out in the Regulation. Certain detailed technical requirements, methodologies, labelling provisions and assessment criteria become applicable at later dates or are further defined through delegated acts, implementing acts and harmonised standards.

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In addition, some of these instruments will apply only after a minimum period following their entry into force (in particular where the Regulation provides for an application period of at least twelve months), meaning that certain measures, in theory, will not apply before August 2027. Mutoh Europe will continue to develop and update its compliance documentation in line with the applicable regulatory timetable.

Our ongoing PPWR compliance programme includes:

- Collecting and reviewing relevant documentation from manufacturing sites and packaging suppliers.
- Identifying the materials and packaging configurations used for our products.
- Classifying packaging into manageable packaging categories or families.
- Linking relevant product and spare-part article numbers to the applicable packaging configuration.
- Progressively compiling the required technical documentation and EU Declarations of Conformity, where applicable.
- Reviewing and updating the documentation as additional PPWR requirements and technical provisions become applicable.

Documentation approach:

To keep the compliance process practical and traceable, documentation is being developed progressively by product and packaging category. Where several products or spare parts use the same packaging construction and materials, these may be managed under a common packaging family, with the relevant article numbers mapped to that packaging configuration.

More detailed packaging information or article-specific information will be made available progressively as the required technical information and conformity documentation are completed.

Important: *This document is a general PPWR compliance status statement. It is not an EU Declaration of Conformity under Annex VIII and does not replace packaging-specific technical documentation or declarations where these are required.*

Issued by:

Mutoh Europe nv
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General Manager Product, Service & QA
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