

PPWR Supplier Declaration

for conformity assessment pursuant to Article 16 of Regulation (EU) 2025/40 (PPWR)

Document	Version	Issue date
PPWR Supplier Declaration	3.1	2026-09-17

1. Supplier

WEHA Plastic Technology GmbH
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42899 Remscheid
Germany

2. Subject and intended use

This declaration applies to plastic reels manufactured and supplied empty by WEHA Plastic Technology GmbH ("WEHA"), as well as plastic flanges, plastic cores and related spacers made of polystyrene (PS).

The products are intended to be wound or loaded by the customer with cables, electrical contacts, microchips or comparable products. The declaration may be supplemented by a customer-specific list of articles.

3. Role in the supply chain and purpose of this declaration

The above products are supplied empty by WEHA. In their intended use, the complete sales packaging generally comes into existence only when the customer winds or applies its product to the reel.

Under the current interpretation of Regulation (EU) 2025/40, the customer filling or using the reel is therefore generally the manufacturer (German: Erzeuger) of the complete sales packaging in the standard case described. WEHA acts as supplier of the empty packaging or packaging materials within the meaning of Article 16 PPWR.

This supplier declaration provides the product, material and compliance information required by the customer for its conformity assessment and, where applicable, for drawing up the EU Declaration of Conformity pursuant to Articles 38 and 39 PPWR.

Important distinction

This document is not the EU Declaration of Conformity pursuant to Article 39 PPWR for the complete packaging after it has been filled or wound with the product. The final allocation of roles may be affected in individual cases, in particular by own branding, contract manufacturing or a different actual use.

4. Product and material information

Material	Polystyrene (PS)
Construction	Mono-material construction
Recycled content	typical share approx. 85%; mechanically recycled material
Substance restrictions	Sum of lead, cadmium, mercury and hexavalent chromium ≤ 100 mg/kg
PFAS	To the best of our current knowledge, no PFAS substances are intentionally added.
Recyclability	Suitable for material / mechanical recycling.
Minimisation	The design is limited to the technical function required; weight and volume are restricted to the necessary level during product design.

Multiple use	Designed for multiple industrial uses; WEHA does not operate its own return or reuse system.
Material identification	PS; final labelling of the complete packaging must be assessed by the manufacturer.

5. Information and documentation pursuant to Article 16 PPWR

WEHA provides the manufacturer of the complete packaging with the information and documentation necessary to demonstrate the conformity of the packaging and packaging materials. This includes the technical information and evidence relevant to the specific conformity assessment under Articles 5 to 11 PPWR.

The underlying supplier, material and test records are maintained by WEHA. Additional customer-specific information and evidence will be provided upon justified request to the extent required for the conformity assessment.

6. Responsibilities of the customer as manufacturer of the complete packaging

- Assessment of the complete packaging, taking into account the wound product, all other packaging components, labels, adhesives and the actual use;
- Performance of the conformity assessment procedure pursuant to Article 38 PPWR and drawing up the EU Declaration of Conformity pursuant to Article 39 PPWR, where the customer is the manufacturer;
- Ensuring the labelling, identification and traceability of the complete packaging in accordance with the applicable PPWR requirements;
- Determining the EPR producer status and the registration, quantity reporting and financing obligations in the Member State in which the packaging is expected to become waste.

7. EPR and registration allocation

WEHA supplies the reels empty and does not place packaged goods on the market by supplying these reels. In the standard case described, WEHA therefore does not assume EPR responsibility for the sales packaging that is only completed when the customer winds or loads it with its product.

This supplier declaration does not constitute a binding determination of producer status for EPR purposes in any Member State. The EPR allocation must be assessed on the basis of the specific supply chain, the actual use and the Member State in which the packaging is expected to become waste.

8. Changes and legal status

Any changes to products, materials or manufacturing processes that may affect the information contained in this declaration will be communicated to affected customers without undue delay.

Legal status notice

This declaration is based on Regulation (EU) 2025/40 and the interpretation published at the issue date, in particular the European Commission Guidelines and the guidance provided by the German Central Agency Packaging Register. It will be updated if the legal position or administrative interpretation changes. It replaces the previous Version 2.0.

Remscheid, 21 July 2026

WEHA Plastic Technology GmbH

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