

Your contact:

Phone:

Fax:

Date:

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Regulation (EU) 2025/40 ("PPWR") – Customer Information

Dear Sir or Madam,

Thank you for your enquiry regarding Regulation (EU) 2025/40 on packaging and packaging waste (PPWR). In accordance with Article 4(1) PPWR, from 12 August 2026 onwards, only packaging or packaged products that comply with the requirements of the PPWR applicable at the time of placing on the market may be placed on the Union market. As virtually every delivery of goods involves the use of packaging, the relevance of the PPWR to the distribution of goods on the EU market cannot be overstated.

We have already reviewed our supply chains to ensure the new regulatory requirements are implemented in compliance with the law. According to our company-specific impact analysis, depending on the respective supply chain or the product concerned, we are classified either as a packaging manufacturer, importer and/or solely as a distributor. We cannot declare that we assume the role of manufacturer and guarantee compliance with the associated manufacturer obligations for all packaged products in our portfolio, as we also distribute products as commercial goods for which, regarding their packaging, we are classified not as packaging manufacturer but solely as distributors within the meaning of the PPWR.

Provided that you are not acting as an end-user and therefore wish to continue making our packaged products available on the market, we are aware that, from 12 August 2026, you will in turn require products in 'PPWR-compliant' packaging for your business activities. For this reason, and to fulfil our own legal obligations, we are working intensively to implement the PPWR in collaboration with our suppliers. It goes without saying that our

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aim is that, from 12 August 2026, only packaging that complies with the relevant labelling requirements and substance restrictions set out in Article 5(4) PPWR will be used for the delivery of our products, and that such packaging will be accompanied by an EU declaration of conformity and technical documentation. As already explained, it is not possible to give a blanket answer as to whether we, as K.D. Feddersen GmbH&Co. KG, are ourselves obliged to fulfil the manufacturer obligations, as we have various supply chains and can only be classified as packaging manufacturer in part.

Insofar as we are classified as a packaging manufacturer within the meaning of Article 3(1) Nr. 13 PPWR, we will fulfil the legal obligations incumbent upon us arising from Article 15 PPWR. To this end, we are conducting a conformity assessment procedure in accordance with Article 38 in conjunction with Annex VII of the PPWR. The necessary technical documentation in accordance with Annex VII and the EU Declaration of Conformity in accordance with Article 39 in conjunction with Annex VIII of the PPWR are maintained accordingly, and the new labelling requirements are implemented.

Please do not hesitate to contact us should you have any queries.

Kind regards

K.D. Feddersen GmbH&Co. KG