

EU Packaging and Packaging Waste Regulation (PPWR) Information for Customers

The *Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR)* introduces responsibilities for different companies throughout the packaging supply chain. The responsibilities of Livonia Print and its customers depend on each company's role under the Regulation. The requirements are derived from PPWR, taking into account the guidance and Frequently Asked Questions (FAQ) published by the European Commission, as well as the practical implementation guidance issued by Intergraf.

PPWR objective, subject matter and relevant definitions:

- 1) The objective of the Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR) is to reduce packaging waste, promote a circular economy, improve the sustainability of packaging throughout its life cycle and ensure the free movement of packaging within the European Union.
- 2) PPWR establishes harmonized requirements for all packaging placed on the EU market, including requirements relating to packaging design, substances of concern, recyclability, recycled content, minimization, labelling, reuse and technical documentation. The Regulation generally becomes applicable from 12 August 2026.
- 3) Packaging is defined as any item, regardless of the material from which it is made, that is intended to contain, protect, handle, deliver or present products throughout the supply chain.
- 4) Under PPWR, the **'supplier'** is the operator "who supplies packaging or packaging material to a manufacturer". The **'manufacturer'** is the operator "who manufactures packaging or a packaged product" or "has packaging or a packaged product designed or manufactured under its own name or trademark. Under the PPWR, **'producer'** is a separate legal concept mainly relevant for Extended Producer Responsibility (EPR) obligations and is not always the same economic operator as the manufacturer."
In the typical business model where Livonia Print manufactures packaging or packaged products on behalf of customers under the customers' name or trademark, Livonia Print acts as the supplier and the customer acts as the manufacturer for PPWR purposes. However, responsibilities depend on the specific supply chain, branding, contractual arrangements and the applicable PPWR definitions. Certain exceptions, including those relating to micro-enterprises, may apply.

Livonia Print responsibilities:

- 1) Livonia Print maintains internal procedures designed to support compliance with applicable PPWR requirements. These procedures include the collection, verification, maintenance and provision of technical documentation and supporting information relating to packaging materials and packaging components used in our products.
- 2) Livonia Print maintains Technical Data Sheets and supporting documentation for the packaging materials and packaging components used for each product or production order. As packaging materials and components may vary between products and orders, the corresponding documentation may also differ.
- 3) Livonia Print maintains traceability of packaging materials and packaging components

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throughout the production process. The materials used for each production order can be identified and linked to the supplier declarations.

- 4) Starting from 12 August 2026, Livonia Print will provide the information and documentation required under Article 16 of the PPWR that is necessary for the manufacturer to demonstrate conformity of the packaging. The documentation will reflect the applicable PPWR requirements in force at the time of supply and will be updated as additional regulatory requirements become applicable.
- 5) Livonia Print reviews and updates its PPWR documentation to reflect changes in applicable legislation, implementing acts, harmonized standards and supplier information, ensuring that the information provided remains accurate and up to date.

Customer responsibilities:

- 1) Where the customer is the manufacturer under the PPWR, it is responsible for ensuring compliance with the applicable PPWR obligations relating to the packaging and packaged products placed on the market under its own name or trademark.
- 2) The customer is responsible for reviewing and assessing the PPWR documentation provided by Livonia Print and determining its suitability for their own compliance statement, technical documentation and declaration requirements.
- 3) Where required, the customer shall combine the information provided by Livonia Print to prepare the complete technical documentation and EU Declaration of Conformity where required.
- 4) The customer is responsible for ensuring that all applicable PPWR obligations not covered by Livonia Print's supplied documentation, including any product-specific or market-specific requirements, are fulfilled before placing the packaged product on the market.
- 5) The customer shall inform Livonia Print of any additional PPWR information or documentation required to meet specific national regulatory requirements.

Some technical requirements under the PPWR will continue to be specified through implementing acts, delegated acts and harmonized standards.

This document provides general information about the PPWR as currently understood. Responsibilities under the PPWR depend on the specific supply chain, contractual arrangements and applicable national implementation of producer responsibility obligations.

03.08.2026.

