

ALBIS, Mühlenhagen 35, 20539 Hamburg

ALBIS Customer Letter

22.06.2026

ALBIS Information regarding Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)

Dear valued Customer,

The objective of Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) is to minimize the environmental impact of packaging and to strengthen the circular economy. It establishes uniform and binding requirements across the European Union for the design, labelling, and circularity of packaging.

ALBIS acts in the role of a **distributor** within the meaning of the PPWR. In this function, we supply products and packaging along the value chain without generally acting as the original entity placing the packaging on the market.

We are fully aware of the regulatory requirements and continuously monitor the further development, specification, and implementation of the PPWR. We are currently analyzing and assessing the impact on our business and supply chain in detail.

As of August 2026, packaging must comply with the requirements of Article 5 of the regulation regarding the minimization of substances of concern.

As a distributor, ALBIS relies on information and declarations provided by upstream suppliers and partners. Based on the information currently available and to the best of our knowledge, the packaging used complies with the limit value of 100 ppm for the sum of lead, cadmium, chromium VI, and mercury in accordance with Article 5 of Regulation (EU) 2025/40 (PPWR), which repeals Directive 94/62/EC.

As our products are plastic granules, the requirements concerning per- and polyfluoroalkyl substances (PFAS) for food contact packaging are not applicable.

In close collaboration with our suppliers, we continuously evaluate opportunities to enhance our packaging solutions, particularly with regard to:

- improving recyclability
- reducing material diversity
- avoiding oversized packaging
- increasing the use of mono-materials and easily separable combinations
- developing reusable packaging systems



In accordance with Article 39 of the regulation, the required EU declarations of conformity and the associated technical documentation for packaging are prepared and maintained by the respective responsible economic operators and will be provided to competent authorities upon request. The regulation does not require these documents to be actively shared with customers.

Please note:

From a legal perspective, ALBIS is not authorized to complete or sign customer-specific documents, declarations, or questionnaires related to PPWR, unless ALBIS itself acts as the responsible economic operator for the respective packaging.

However, we are pleased to support you by:

- providing all relevant available information and data, and
- assisting you to the best of our ability with the interpretation and completion of relevant documentation

Exception:

In cases where ALBIS modifies the original packaging (e.g. repacking from silo into bags, octabins, or other formats), ALBIS may assume additional responsibilities as an economic operator and can support the corresponding documentation within this scope.

This statement is based on the information currently available and may be updated as further regulatory clarifications and technical developments emerge.

Your ALBIS sales contact is available to discuss any questions you may have concerning this situation.

Kind regards,
ALBIS Distribution GmbH & Co. KG