

PPWR Regulatory Information Statement

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

Issuing company: RAJAPACK Benelux

Product(s) concerned: Packaging products supplied by RAJAPACK Benelux to the customer at the date of issue of this statement.

Date of issue: 04/08/2026

Purpose of this Statement

RAJAPACK Benelux hereby confirms that the packaging products concerned are assessed against the applicable requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR). Based on the information, technical documentation and compliance evidence available at the date of issue, no non-conformities have been identified with respect to the PPWR requirements currently applicable to the packaging products concerned, including, where relevant, Articles 5 to 12 of Regulation (EU) 2025/40. This assessment remains subject to any delegated acts, implementing acts, harmonised standards, guidance documents or other regulatory measures that may be adopted, amended or clarified after the date of this statement.

Nature of this Statement

This document is **not an EU Declaration of Conformity (DoC)** within the meaning of Article 39 and Annex VIII of Regulation (EU) 2025/40. It is a regulatory information statement issued by RAJAPACK Benelux to support its customers in their PPWR compliance activities. The official EU Declaration of Conformity, where applicable, remains a distinct regulatory document to be established by the economic operator responsible under the applicable legislation.

Basis of Assessment

This statement is established on the basis of information available to RAJAPACK Benelux at the date of issue, including where applicable:

- supplier compliance documentation;
- technical specifications;
- material declarations;
- product-related compliance information;
- test reports or compliance information from manufacturers;
- internal compliance assessments and reviews;
- other relevant technical or regulatory information.

Supporting evidence is retained within RAJAPACK Benelux's internal compliance documentation system.

Confidentiality of Supporting Documentation

Certain supporting documents may contain confidential commercial information, including supplier identities, formulations, technical specifications, test reports, manufacturing information and proprietary know-how.

Consequently, detailed technical documentation, supplier documentation and source records are not systematically distributed to customers.

Requests for additional technical documentation shall be assessed individually, taking into account legal obligations, contractual commitments, confidentiality requirements, intellectual property rights, commercial interests, the legitimate purpose of the request and the availability of the requested information.

Where justified for regulatory compliance verification, customer audits, contractual requirements or official inspections, relevant documentation may be provided under appropriate confidentiality arrangements and subject to applicable legal and commercial restrictions.

Roles and Responsibilities under the PPWR

The PPWR assigns specific obligations to different economic operators, including manufacturers, importers, authorised representatives, distributors and other relevant economic operators, depending on the specific supply-chain situation. Compliance responsibilities therefore remain with each economic operator as defined by Regulation (EU) 2025/40.

This statement is intended to support customers in their compliance evaluation process and does not replace their obligation to assess and fulfil their own responsibilities under Regulation (EU) 2025/40 or any applicable national requirements.

Specific Provisions for Customised or Made-to-Order Packaging

Where packaging is supplied on the basis of customer-specific instructions, designs, dimensions, printing, configurations, compositions or other modifications requested by the customer, the customer may, under the applicable legislation, be considered in whole or in part as the manufacturer or another responsible economic operator.

In such cases, this statement only relates to the information available to RAJAPACK Benelux concerning the materials, components and packaging products supplied by RAJAPACK Benelux.

The customer remains responsible for:

- assessing its legal role within the supply chain;
- carrying out any required conformity assessments;
- preparing any required technical documentation;
- drawing up any required declarations of conformity;
- complying with any applicable registration, reporting and information obligations.

RAJAPACK Benelux will, to the extent reasonably available and commercially appropriate, provide relevant technical information concerning the materials and components supplied by RAJAPACK Benelux in order to support customers in fulfilling their own legal obligations.

Limitations of this Statement

This statement relates exclusively to the packaging products supplied by RAJAPACK Benelux to the customer at the date of issue of this statement and to the information available to RAJAPACK Benelux at that date.

This statement does not constitute:

- legal advice;
- regulatory approval;
- certification;

- an independent conformity assessment;
- a guarantee of compliance.

RAJAPACK Benelux does not assess how packaging products are combined, modified, printed, labelled, filled, assembled, integrated or otherwise used by the customer or any third party within their own packaging systems, processes or supply chains.

Any final assessment of compliance for the specific use of a packaging product remains the responsibility of the customer or any other responsible economic operator.

Validity

This statement is issued in good faith on the basis of information available on the date of issue.

It may require revision in the event of:

- modifications to the product;
- changes in raw materials or composition;
- changes of supplier or manufacturing source;
- modifications to the supply chain;
- publication of new delegated acts, implementing acts, harmonised standards or other regulatory measures;
- new or updated technical or compliance information affecting the product's compliance status.

Limitation of Use and Liability

This statement is provided exclusively for information and compliance-support purposes. It is based on information available to RAJAPACK Benelux at the date of issue and does not constitute a legal opinion, regulatory approval, certification, independent conformity assessment or guarantee of compliance.

RAJAPACK Benelux shall not be liable for compliance assessments, regulatory obligations, reporting duties, declarations, registrations or other legal responsibilities that remain incumbent upon the customer or any other economic operator under applicable legislation.

Any assessment of compliance by the customer remains the sole responsibility of the customer and should take into account the intended use of the product, the specific supply-chain configuration and any applicable regulatory requirements.

For RAJAPACK Benelux

Name: Gidi Pluym

Position: General Manager RAJAPACK Benelux

Date: 04/08/2026

