

Statement of KWC Aquarotter GmbH on Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR)

On February 11, 2025, the EU Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR) entered into force, with its provisions becoming applicable as of August 12, 2026. From this date, empty and filled packaging placed on the Union market must comply with the respective applicable requirements of the PPWR.

We, KWC Aquarotter GmbH, hereby confirm that we consider and implement the requirements of Regulation (EU) 2025/40 on packaging and packaging waste (Packaging and Packaging Waste Regulation – PPWR).

As a manufacturer of packaging pursuant to Article 15 PPWR, our company is obliged to demonstrate compliance with these requirements within the framework of conformity assessment procedures, through technical documentation, and EU declarations of conformity.

Scope and Role as Manufacturer

Our scope covers all empty packaging, packaging components, and packaging materials placed on the market by us. As a manufacturer, we bear responsibility under Article 15 PPWR for compliance with the essential requirements of the Regulation (including substance restriction limits, recyclability, recycled content, and minimization).

Provision of Information and Evidence

As a manufacturer within the meaning of Art. 3 (1) (13) of Regulation (EU) 2025/40 (PPWR), KWC Aquarotter GmbH draws up the technical documentation in accordance with Art. 38 in conjunction with Annex VII. It issues the EU declaration of conformity in accordance with Art. 39 in conjunction with Annex VIII. For this purpose, KWC Aquarotter GmbH requests the necessary information and evidence from its suppliers (in accordance with Art. 16 PPWR).

As a reliable partner, we support our customers in fulfilling their legal obligations and provide them with the necessary evidence of conformity and technical information upon request. We remain at your disposal at any time for further inquiries or additional information.

Material requirements pursuant to Art. 5 PPWR

We ensure compliance with all material requirements for the packaging materials and packaging supplied by us.

The sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium [Chromium (VI)] will not exceed the permissible limit of 100 mg/kg.

Future Requirements of the PPWR

The European Commission will publish supplementary delegated acts and implementing acts for various regulatory areas of the PPWR. Since the specific design of some of these acts is still pending, a final implementation of individual requirements is currently not yet possible.

This applies in particular to the following areas:

- Recyclability pursuant to Art. 6 (from 2030),
- Minimum recycled content and compostability pursuant to Art. 7 and Art. 9 (from 2028 and 2030, respectively; insofar as relevant for the respective products),
- Packaging minimization pursuant to Art. 10 and Art. 24 (from February 12, 2028, at the earliest),
- Labelling requirements pursuant to Art. 12 (from August 12, 2028),
- Reuse requirements pursuant to Art. 11 as well as Art. 26 et seq. (gradual implementation from 2030).

Sustainability and PPWR Compliance

Sustainability and resource efficiency are essential components of the corporate strategy of KWC Aquarotter GmbH.

Our packaging solutions are continuously developed with regard to environmental compatibility, recyclability, and circularity. In doing so, we strictly align ourselves with the requirements of the PPWR as well as the principles of sustainable packaging design.

Through close cooperation with our customers, we support them in achieving their sustainability goals and in the legally compliant implementation of future regulatory requirements.

Final Provisions

This statement refers exclusively to the packaging materials and packaging supplied by KWC Aquarotter GmbH, as well as to the legal and knowledge status applicable at the time of drafting this document.

We reserve the right to make changes or amendments, in particular due to future legal adaptations, published implementing acts, or product-related changes.

We will continuously inform our customers about relevant developments and continue to actively support the implementation of legal requirements.

Subject to legal changes, this document is valid until February 11, 2028.

19.08.2026 

Date / Signature Managing Director