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To all Business Partners of Ludo Fact

**Ludo Fact GmbH**

Kreativität in Kartonagen

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Jettingen-Scheppach, September 1, 2026

Subject: Packaging and Packaging Waste Regulation (PPWR)

Dear Business Partners of Ludo Fact,

Over the past few weeks, we have received several inquiries regarding PPWR-related documents, each requesting different requirements. This is not surprising, as there are currently many uncertainties regarding the implementation of the PPWR, which entered into force on 12 August. Ludo Fact has become a focal point for questions from across the industry, and we would therefore like to outline the measures we are currently taking.

However, we must first point out that it is still not entirely clear who bears which responsibilities and who is required to implement which measures. Even the FAQ document published by the EU on 3 August 2026 has not provided complete clarity in every respect. As a result, the Ludo Fact team is gathering information from a variety of sources. We are sure you will understand that larger technical solutions, if they are ultimately required at all, can only be addressed once there is certainty regarding which market participant must implement which measures, at what time, and in what manner.

At present, for example, the DVSI is still in contact with the German Environment Agency (*Umweltbundesamt*) and the Central Packaging Register Office (*Zentrale Stelle Verpackungsregister*) in order to obtain answers to urgent questions concerning responsibilities and implementation. This includes questions that remain unresolved, such as what exactly constitutes packaging material and where addresses must be displayed.

What needs to be done now?

A public consultation phase regarding the provisions for national producer registers under the PPWR is currently underway. This consultation will end on 10 September 2026. The results are likely to influence the implementation and practical application of the PPWR. Furthermore, there is a transitional period during which existing materials may continue to be sold and used without modification. This applies at all levels of the supply chain. Since suppliers maintain inventories, as does Ludo Fact, materials that do not yet fully comply with the PPWR will continue to be used in the immediate future.

Ludo Fact is currently implementing those measures that, based on the FAQ document of 3 August, we believe clearly fall within our area of responsibility. The following measures will be implemented over the coming weeks:

- All game shipping cartons will be printed with a QR code linking to a webpage containing all information about the producer, namely Ludo Fact. For these shipping cartons, there can only be one producer within the EU: Ludo Fact, not the individual publisher.

- Declarations of Conformity for the materials used in the shipping cartons will be made available on a dedicated webpage on our website and can be accessed there in the future. All packaging covered by the respective declaration will be clearly identified and listed.

- We will determine and provide the weights of the individual packaging materials. We are currently evaluating how this information can be made available in an automated manner. Unfortunately, our ERP system is not designed for this purpose, which means adjustments will be necessary. A further consideration is at which stage this data can be considered reliable, without further changes to an order remaining possible. Therefore, it is likely that this information will be provided after completion of an order.

- Additional materials: Stretch film for pallets and any other transport packaging materials are considered standard off-the-shelf products. In these cases, the material manufacturer is regarded as the producer. Ludo Fact will therefore obtain Declarations of Conformity from these suppliers and, based on these, issue our own Declaration of Conformity.

Ludo Fact is actively working on the implementation of the regulation. Due to the remaining uncertainties, further amendments and clarifications to the PPWR are likely. We will continue to monitor developments closely and will make the necessary adjustments on our side as soon as responsibilities and obligations have been clearly defined, ensuring that you will have the required documentation available for your respective declarations of conformity.

We kindly ask for your patience during this transitional period. Given the current uncertainties surrounding the regulation, we can only implement adapted measures gradually as greater clarity becomes available.

Kind regards,



Ludo Fact GmbH