

Information – EUDR Integration GGP Media

Relevance of the EUDR for GGP

As a printing company – a paper and thus wood-processing market participant within the EU, which puts into circulation relevant products (printed products) in accordance with this regulation – GGP is subject to the EUDR (EU Deforestation Regulation). This regulation obliges companies in EU member states to market only relevant raw materials and products that do not contribute to deforestation or active forest degradation. Due to the size of our company, we are classified as a non-SME market participant by the EU Commission and thus are subject to the comprehensive due diligence obligation according to Article 8 of the EUDR.

EUDR-relevant Materials/Products and Obligations at GGP

(HS Code = Harmonized System Codes - standardized commodity codes in international trade)

a) Use of EUDR-relevant Raw Materials/Products at GGP

As a printing company, we process paper and cardboard (HS Code 48) in combination with supplied products from other printing companies (products of the graphic arts - HS Code 49), referred to as EUDR-relevant raw materials and products. In accordance with the EUDR requirements, suppliers of these materials are obligated to provide a due diligence declaration and to pass on the reference and verification numbers obtained along the supply chain, including to us. GGP itself is also subject to the due diligence obligation and must therefore verify the accompanying reference and verification numbers in the EU information system to ensure that the supplied materials were produced without deforestation and in compliance with applicable legal regulations. This also applies to supplied product components such as covers, color plates, inserts, etc., which shape or are physically connected to the printed product we manufacture.

Exempt from the due diligence obligation are supplied product parts that are merely included as advertising material with the actual printed product (inserts, labels, stickers etc.). Furthermore, raw materials and products that are not in our ownership during processing (e.g., paper provided by the customer) are also not subject to GGP's due diligence obligation.

b) Production of EUDR-relevant Products at GGP

GGP manufactures EUDR-relevant products – so-called "products of the graphic arts" (HS Code 49). Therefore, we are required to provide a due diligence declaration for our products and refer to the due diligence declarations transmitted by our suppliers (as per point a) in the information system of the European Commission. By submitting the due diligence declaration, we confirm that we have fulfilled our due diligence obligation as a company and that our products have been produced without deforestation and in accordance with applicable legal regulations. Furthermore, we commit to passing on the corresponding reference and verification numbers of our submitted due diligence declarations along the supply chain to our purchasing companies/customers so they can use them for their own due diligence declarations.

c) Obligation of Retention

As required by all market participants, we also comply with the EUDR obligation of retention by archiving all EUDR-relevant information for a minimum duration of 5 years.

Practical Implementation of the Due Diligence Obligation at GGP

In general, we plan to establish a fully digital processing of EUDR-relevant processes within our company and in exchange with our customers and suppliers.

a) Compliance with Due Diligence for Delivered EUDR-relevant Raw Materials/Products

Regarding the deliveries of EUDR-relevant raw materials/products, we strive for an interface-based transfer of the reference and verification numbers from our suppliers. The transmission of the EUDR information will have to occur before the arrival of the goods to enable a timely review of the submitted due diligence declarations, thereby ensuring that we only accept EUDR-compliant materials upon receipt of goods. The review will be automated through a technical connection to the EU TRACES system.

If such a connection with suppliers is not feasible, we offer an alternative solution where the EUDR-relevant information for a delivery can be entered into an online form provided by us and submitted to GGP. Deliveries for which we do not receive a reference and verification number through these two methods cannot be accepted.

b) Passing on Due Diligence Declaration Information to Our Customers

GGP plans to submit a due diligence declaration for each order via a digital connection in the EU TRACES system and to automatically receive and process a reference and verification number. To comply with our due diligence obligations and due to the short timeframe between the creation and completion of the due diligence declaration, we will pass this information on to our customers upon dispatch of the products. We prefer to provide EUDR-relevant information through an order data interface between GGP and the customer's ERP systems, as long as it is already available or can be established. This approach enables secure and timely processing of EUDR-relevant information in the customer's ERP system before the delivery arrives at the customer's warehouses.

If there is no digital connection between GGP and the customer's ERP system, we will directly indicate the reference and verification number of the order on the delivery notes and pass it on to our customers in this manner.

For any further questions, please feel free to contact our EUDR team through your usual GGP contact.