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PPWR (EU) 2025/40 Statement of Compliance Paper, Corrugated Cardboard and/or Solid Board Packaging

Waddinxveen, 09-04-2026

Dear Sir/Madam,

The European Packaging and Packaging Waste Regulation (PPWR) (EU) 2025/40 entered into force in February 2025, with general applicability from August 2026. This regulation establishes a harmonised framework for packaging sustainability, recyclability, material transparency, and compliance within the European Union.

Scope

This statement applies to paper-, corrugated cardboard-, and solid board packaging that is

- Used as transport and/or secondary packaging
- Intended for professional supply chains, including applications in fresh produce and food-related logistics

This statement does not apply to:

- Primary consumer packaging
- Non-paper-based packaging materials

The above-mentioned packaging qualifies as **transport packaging**, intended to:

- Protect goods during handling and transport
- Enable safe and efficient logistics operations
- Facilitate storage and distribution within professional supply chains

PPWR timeline reference

This statement is prepared with reference to the PPWR implementation timeline:

- Entry into force: February 2025
- General applicability: August 2026
- Recyclability requirement: by 1 January 2030
- Enhanced recyclability performance criteria: by 1 January 2038

Material composition & documentation

All paper-based packaging is subject to a documented material composition assessment based on:

- Supplier declarations and technical data
- Identification of constituent materials and additives
- Assessment of mono-material or fibre-based structures
- Traceability of raw materials through supplier documentation

Where applicable, fibres are sourced from renewable and responsibly managed resources, and recycled content is used where technically feasible and compliant with regulatory and functional requirements.

This information is maintained within LC Packaging's quality management system and technical documentation.

Recyclability assessment

The above-mentioned packaging is evaluated in line with PPWR recyclability principles, taking into account:

- Material composition and fibre content
- Compatibility with established EU paper recycling streams
- Absence of disruptive materials (e.g. plastic laminations where applicable)
- Use of recycling-compatible inks and adhesives

For the above-mentioned packaging recyclability will be assessed against the PPWR performance classification framework (A/B/C), based on:

- Material compatibility
- Separability
- Availability of recycling infrastructure

The paper and cardboard packaging supplied by LC Packaging is already generally aligned with established fibre recycling systems and is expected to meet PPWR recyclability requirements within the applicable timelines.

Packaging minimisation (Articles 9 & 10 PPWR)

Packaging design is function-driven and assessed to ensure:

- Use of the minimum material necessary to fulfil its intended function
- Avoidance of unnecessary layers, over-dimensioning, or excessive void space
- Optimisation of transport efficiency, palletisation, and load stability

Any deviations from minimisation principles are technically justified based on product protection, hygiene, safety, or logistical requirements.

Substances & chemical compliance

Packaging materials are assessed in accordance with:

- Article 5 PPWR
- Applicable EU chemicals legislation (including REACH and CLP)
- Food contact legislation where applicable

This includes verification that:

- The sum of heavy metals (lead, cadmium, mercury and hexavalent chromium) does not exceed 100 mg/kg
- PFAS are not intentionally added

Compliance is based on supplier declarations, material data, and risk assessment procedures and, where applicable, supported by testing and migration data.

Re-use considerations

In accordance with Article 29.4 d) PPWR:

- Cardboard transport packaging is exempt from reuse targets



Due to:

- Structural degradation after use
- Sensitivity to moisture and hygiene requirements
- Operational constraints in fresh produce and logistics applications

This packaging format is not considered suitable for reuse systems.

Labelling & information

Where applicable:

- Packaging materials are identifiable within established waste streams
- Information supporting correct sorting and recycling is made available to professional users

Future harmonised labelling requirements will be implemented in accordance with PPWR timelines.

Extended Producer Responsibility (EPR)

Royal LC Packaging complies with applicable Extended Producer Responsibility (EPR) obligations in relevant EU Member States, including:

- Reporting of packaging volumes
- Financial contributions to collection, sorting, and recycling systems

Implementation status & continuous compliance

Royal LC Packaging confirms that PPWR requirements are being actively implemented through:

- Product design reviews
- Quality assurance processes
- Supplier management and qualification
- Compliance documentation and technical files

Regulatory developments are continuously monitored, and internal procedures are updated accordingly to ensure ongoing and demonstrable compliance.

Declaration

Based on the above, Royal LC Packaging declares that the paper and cardboard packaging covered by this statement is assessed and managed in line with the applicable requirements of Regulation (EU) 2025/40 (PPWR) and the relevant implementation timelines.

This statement reflects the PPWR requirements applicable at the time of placing the packaging on the EU market and will be reviewed and updated, where necessary, in response to delegated acts, implementing measures, harmonised standards, and further regulatory guidance.
