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**Statement on PPWR
(EU 2025/40 on Packaging and Packaging Waste)**

**For our cardboard/solid-fibre board Packaging for Food, Fruit & Vegetables
(fibre-based punnets)**

Waddinxveen, 07-04-2026

Dear Sir/Madam,

This Statement is issued in accordance with Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR).

The undersigned declares that our cardboard/solid-fibre board Packaging for Food, Fruit & Vegetables (cardboard punnets) placed on the EU market, complies with all applicable and relevant provisions of the PPWR regulation, set within the legally established timelines.

This Statement applies exclusively to the cardboard/solid-fibre board Packaging for Food, Fruit & Vegetables (cardboard punnets) for direct and/or indirect contact with processed or cut vegetables and fruit and which already complies with the European legislation concerning packaging materials intended to be used for the packaging of foodstuffs.

This Statement applies therefore to our fibre based primary (consumer) packaging and has been evaluated against the following PPWR timeline:

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

This Statement is therefore composed referencing the PPWR requirements applicable at the time of placing the packaging on the EU market.

The above-mentioned fibre-based packaging (fibre-based punnet) qualifies as “sales packaging” as it is conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale.

The design of fibre-based punnets is function-driven, and they are designed to replace PP/PE punnets from the waste streams.

Any material used in this packaging is technically justified by product protection, hygiene, safety, and transport stability requirements, in accordance with Articles 9 and 10 PPWR.

The fibre-based packaging as described above

- is designed using the minimum material necessary to fulfil its intended function;
- avoids over-packaging, unnecessary layers or excessive void space;
- is dimensioned to optimize palletisation, transport efficiency, and load stability.

Any deviations from minimum material use are demonstrably justified on technical or regulatory grounds.

The fibre-based punnets

- consist predominantly of paper and cardboard fibres.
- are recyclable at scale through established EU paper recycling streams.
- are designed in accordance with recognised recyclability principles, including:
 - the absence of plastic laminations or disruptive coatings;
 - the use of recycling-compatible inks and adhesives.

Accordingly, the fibre-based packaging already meets the PPWR requirement that all packaging placed on the market shall be recyclable by 2030.

The fibre-based packaging supplied by LC Packaging Belgium NV supports the PPWR objectives of circular material flows and resource efficiency:

- The packaging is based on mono-material or fibre-based constructions compatible with recycling.
- Fibres are sourced from renewable and responsibly managed sources.
- Recycled content is used where technically feasible without compromising functional or regulatory requirements.

Substances & chemical compliance

The punnets 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.

While the PPWR introduces reuse targets, for certain transport packaging formats and cardboard packaging is exempt:

Note 95 PPWR:

“For certain types of transport or sales-packaging, reusable alternatives are not an option. This is the case for cardboard boxes, where the number of rotations is very low, and for packaging used for certain contact-sensitive products, which require special washing between uses.

Therefore, such packaging should be exempted from the obligation to meet the re-use targets for transport packaging and sales packaging used for transporting products”

Therefore, the fibre-based punnets that LC Packaging Belgium NV supplies are exempt from the re-use obligations set out in the PPWR on the basis that they

- are not technically suitable for repeated reuse due to structural degradation and hygiene constraints and moisture sensitivity.
- are not economically viable for reuse systems in Food, Fruit & Vegetables and Logistics Applications.

Where applicable under harmonised EU rules:

- The packaging is clearly identifiable as paper/cardboard packaging.
- Information supporting correct sorting and recycling is made available to professional users.

Any future mandatory harmonised labelling requirements will be implemented within the applicable transition periods.

Extended Producer Responsibility (EPR)

LC Packaging Belgium NV complies with the applicable Extended Producer Responsibility (EPR) obligations in each EU Member State and thus ensures accurate reporting of packaging quantities and materials and contributes financially to collection, sorting, and recycling schemes as required by national EPR systems.

This Statement is based on the PPWR text as adopted and applicable at the date of issue and will be reviewed and updated in response to:

- Delegated and implementing acts;
- Harmonised standards;
- Regulatory guidance issued by EU institutions or national.

Continuous monitoring by LC Packaging Belgium NV ensures ongoing conformity with PPWR obligations.

Based on the above, the undersigned hereby declares that the fibre-based punnets covered by this document comply with the applicable requirements of Regulation (EU) 2025/40 (PPWR) within the prescribed timelines.

This Statement is issued in good faith and may be presented to customers, authorities, or other competent bodies as evidence of PPWR alignment.
