

General Documentation on the EU Packaging and Packaging Waste Regulation (PPWR)

Regulation (EU) 2025/40 – Packaging and Packaging Waste Regulation

Company: Barcotec GmbH, Julius-Welser-Straße 15, 5020 Salzburg, ATU34740000

Contact: Eva de la Rosa, delarosa@barcotec.at, +43662424600 **Document version:** 1.0

Effective as of: May 2026

1. Purpose and Scope

This document outlines how we, as a reseller, comply with the requirements of the EU Packaging Regulation (PPWR, Regulation (EU) 2025/40). We make it available to our customers upon request. It is intended as general information and does not replace either a product- or batch-specific declaration of conformity or legal advice.

Note: The PPWR has been in effect since February 11, 2025; the majority of the obligations will apply as of August 12, 2026. Numerous detailed requirements (including labeling formats, recyclability criteria, and recycled content targets) will only be specified in pending delegated acts and implementing acts. This document will be updated accordingly as needed.

2. Our Role in the Supply Chain

We are a retailer and use only packaging that we source from our suppliers. We pass this on unchanged—we do not manufacture packaging ourselves and do not alter its properties.

We source our goods globally. The respective manufacturer determines where they are actually shipped from. Depending on the shipment, our role under the PPWR may therefore vary:

- If we source within the EU, we generally act as a distributor.
- If we are the first to place goods from a third country on the EU internal market, we may be considered an importer—with correspondingly broader obligations.

We assess our role based on the procurement channel. We reserve the right to make a final legal determination.

3. Packaging Materials Used

We use only the following packaging materials:

Material	Typical use
Paper	Inserts, padding, outer packaging
Cardboard	Shipping and folding boxes
Plastic/bubble wrap	Protective, cushioning, or outer packaging film

4. Ensuring Compliance Through Suppliers

Because we source packaging directly from our suppliers without modification, we rely on the information provided by our suppliers and manufacturers regarding the substantive PPWR requirements (such as recyclability, material restrictions, and labeling). We fulfill our due diligence obligations as a reseller and do not distribute any packaging that we know to be non-compliant.

- We require our suppliers to provide the relevant proof of compliance, such as declarations of conformity and information on materials and recyclability.
- If we have such documentation, we forward it to customers upon request or identify the supplier.
- To the extent reasonable, we verify whether the required labeling is present.

5. Labeling

Material labeling and instructions for separate collection are governed by the PPWR and the related implementing acts, which are still pending. We receive the relevant labeling from the respective manufacturers and suppliers.

6. Substance Restrictions

We require our suppliers to confirm that the material requirements of the PPWR are met.

7. Extended Producer Responsibility (EPR)

For packaging that we place on the market in Austria, we track and license the resulting volumes through the relevant collection and recycling systems (ARA / ERA).

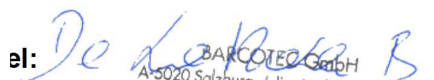
Note: EPR licensing (ARA/ERA) pertains to volume-based exemption in Austria and is not equivalent to material compliance with the PPWR (e.g., recyclability, labeling, substance limits). Both aspects are considered separately.

8. Disclaimers

- This document is of a general nature and does not constitute an article- or batch-specific declaration of conformity.
- The content may change due to pending implementing acts for the PPWR; the current status is indicated at the beginning of the document.

Place, Date: Salzburg, May 2026

Signature / Stamp: el:


BARCOTEC GmbH
A-5020 Salzburg, Julius-Welser-Straße 15
☎ 0662/424 600, Fax: 0662/424 601