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STATUS INFORMATION ON THE EU PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) entered into force on 11 February 2025 and will generally apply from 12 August 2026. However, many detailed provisions will only be clarified through implementing acts and delegated acts that have yet to be adopted. For this reason, a universally applicable and final assessment of all future requirements is currently not possible. Accordingly, this letter serves as a preliminary status update.

Packaging used by KLINGER Dichtungstechnik

For the shipment of our products, we currently use in particular:

- » Kraft paper (not used as void fill material and therefore not relevant for void-space requirements)
- » Cartons and corrugated cardboard
- » Single-use wooden pallets
- » Reusable wooden pallets (EUR pallet system)
- » Wooden crates
- » Cardboard pallet boxes (Pal-Boxes)
- » Strapping bands

These packaging items are predominantly used for the handling, securing and transportation of products and generally fall within the definition of transport packaging pursuant to Article 3(1)(7) PPWR.

Current status

According to the currently published guidelines on Regulation (EU) 2025/40, the producer of the transport packaging is generally considered to be the manufacturer in the case of transport packaging used by KLINGER Dichtungstechnik. A different allocation may apply, in particular, where the packaging is clearly marked with the name or trademark of the recipient. As the transport packaging used by KLINGER Dichtungstechnik is not marked with the name or trademark of KLINGER Dichtungstechnik, KLINGER Dichtungstechnik is, according to the current interpretation, generally not considered to be the producer of the shipped packaging. Consequently, the obligations assigned to the producer under the PPWR generally apply to the respective packaging manufacturer and not to KLINGER Dichtungstechnik.

For the purpose of determining the obligations of the individual economic operators under the PPWR, it is essential that KLINGER Dichtungstechnik's customers independently assess and determine their respective role under the Regulation. Such role is not necessarily identical to that of KLINGER Dichtungstechnik and must be evaluated on a case-by-case basis, taking

into account, among other factors, the customer's specific activities, place of establishment, and position within the relevant supply chain.

Transport packaging is exempt from certain consumer labelling obligations. According to the European Commission's guidelines relating to Article 12(1) PPWR, transport packaging is exempt from the harmonised waste-sorting labelling requirements. Accordingly, the transport packaging used by KLINGER Dichtungstechnik (in particular corrugated cardboard boxes, kraft paper, pallets and wooden crates) is generally not subject to the consumer-facing sorting and material identification labelling requirements pursuant to Article 12(1) PPWR.

However, separate labelling requirements may apply in the future to reusable transport packaging operating within a reuse system. The relevant detailed requirements will be specified by a future implementing act of the European Commission.

The cardboard, corrugated cardboard and paper packaging used by KLINGER Dichtungstechnik is not subject to the reuse targets set out in Article 29 of Regulation (EU) 2025/40. The reuse targets under Article 29 apply exclusively to the packaging formats expressly listed therein. Strapping and pallet wrapping are subject to the derogation introduced by Decision (EU) 2026/429. Under this derogation, economic operators that use these packaging formats for the stabilization and protection of products transported on pallets are exempt from complying with the reusability requirements laid down in Article 29(2) and (3) of the PPWR. Cardboard boxes and cardboard pallet boxes (Pal-Boxes) are likewise exempt from the reuse obligations pursuant to Article 29(4)(d) PPWR.

The European Commission's guidelines further clarify that Member States may not impose additional reuse targets on transport packaging such as cartons that are exempt from the PPWR reuse targets. To the extent that the single-use pallets and wooden crates used by KLINGER Dichtungstechnik fall within the packaging formats referred to in Article 29, the corresponding reuse targets will become relevant no earlier than 1 January 2030.

For other PPWR requirements, future European implementing measures will be decisive.

Our commitment

We continuously monitor further developments relating to the PPWR as well as the associated guidelines and legal acts.

We confirm that we will implement the requirements of Regulation (EU) 2025/40 applicable to our role within the supply chain.

To the extent that we are required by applicable law to provide information, we will make the necessary and available information available to our customers upon request.

The statements above are based on the current status of Regulation (EU) 2025/40 and the guidelines published by the European Commission. Future implementing acts, delegated acts or further interpretative guidance may result in adjustments to this assessment.

Rich. Klinger Dichtungstechnik
GmbH & Co KG

A handwritten signature in blue ink, appearing to read "Stephan Piringer", is written over the company name.

Dipl.-Ing. Stephan Piringer, MBA
HSE & Legal Compliance