

Information on Packaging and Packaging Waste

smart-TEC GmbH & Co. KG is committed to fulfilling its obligation to comply with relevant environmental regulations and to continuously improve environmental protection. For many years, we have been steadily reducing our environmental impact—such as energy consumption, wastewater, waste, and the presence and quantities of pollutants—at our facilities and in our products.

As a manufacturer of durable product labels and custom NFC/RFID transponders for Industry 4.0 and the IoT, we ship our products in environmentally friendly outer packaging. smart-TEC GmbH & Co. KG is registered in the Packaging Register (LUCID) of the Central Packaging Register Foundation (ZSVR) (Reg. No. DE3247355718158).

The EU Packaging and Packaging Waste Regulation (PPWR) sets requirements for packaging. The goal is to prevent or reduce the environmental impact of packaging waste. To achieve this, packaging waste should be avoided as a priority and, where possible, reused or recycled.

In light of various regulations, we have been committed for many years to reducing the amount of packaging we use without negatively impacting the quality of our products. We ensure that the packaging we use is free of harmful substances, sustainable, and recyclable.

We have already been implementing many of the requirements of the EU Packaging Regulation (PPWR) for quite some time. These include the increased use of recycled materials, the continuous improvement of our packaging's recycling rates, and the development of sustainable packaging solutions. As part of our environmental management certification under DIN ISO 14001, we have established appropriate processes and control mechanisms to ensure compliance with the new EU Packaging Regulation and to continuously improve our environmental performance.

As of the date indicated, radio-frequency identification tags (RFID tags) are not considered packaging (*Regulation (EU) 2025/40, Annex I, B., 2.*)

Information on the Packaging Regulation (EU) 2025/40 (PPWR)

Regulation (EU) 2025/40 sets forth different transition and implementation deadlines for various requirements. As a result, certain labeling or information requirements cannot be implemented until the dates specified by law.

1. The Role of End Users in Waste Prevention

End users play a significant role in preventing packaging waste through their behavior. To reduce waste, the following is recommended:

- Use packaging only to the extent necessary
- Reuse packaging multiple times, if appropriate
- Empty packaging as completely as possible and send it for appropriate recycling
- Avoid unnecessary damage to packaging that makes reuse or recycling difficult

2. Reuse of Packaging

If packaging is labeled as reusable, it may be used multiple times under normal conditions of use. Reusable packaging may be used multiple times under normal conditions of use, provided it is undamaged and functional. Where return or reusable systems are in place, they must be used in accordance with the respective terms and conditions. Packaging that is not designed to be reusable must be treated as single-use packaging.

3. Separate Collection and Disposal of Packaging Waste

End users are encouraged to sort packaging waste and dispose of it through the appropriate collection systems. Depending on the application, our packaging consists primarily of paper and cardboard, plastics (e.g., PE), and composite materials.

Disposal Instructions:

- Paper and cardboard: Waste paper collection
- Plastic packaging: Designated collection systems (e.g., yellow bin / recycling collection)
- Composite materials: In accordance with local regulations

Packaging components made of different materials (e.g., cardboard, film, plastic bags, or liners) should be disposed of separately whenever possible to support high-quality material recycling.

4. Significance of Markings and Labels (Art. 12 PPWR)

Packaging may include markings, symbols, or labels that provide information on material composition, reusability, recyclability, or disposal.

Typical markings and their meanings are:

- Material labels (e.g., paper, plastic, composite materials): Provide information about the composition of the packaging and help ensure proper sorting.
- Recycling instructions (e.g., collection systems or sorting guidelines): Indicate how and through which system the packaging should be disposed of.
- Reusability labels: Indicate whether packaging can be reused multiple times.
- Labels for recycled materials: Provide information on the percentage of recycled content in the packaging.
- Labels for special material properties (e.g., compostable): Provide guidance on specific disposal requirements.

The specific format of the labels may vary depending on the type of packaging. End users are urged to pay attention to these labels and act accordingly. The relevant labeling requirements take effect as of the date specified by law. The specific format of some labels is determined by subsequent legal acts of the European Commission.
(For examples, see Appendix 1)

5. Environmental and Health Impacts of Improper Disposal

Improper disposal of packaging waste can have negative impacts on the environment, human health, and safety. In particular, carelessly discarding packaging into the environment or disposing of it as part of mixed municipal solid waste can promote the release of harmful substances, impair the recyclability of materials, and cause additional environmental burdens due to inefficient waste treatment. Single-use packaging, particularly plastic packaging, can have long-term environmental impacts if disposed of improperly.

6. Compostable Packaging

If packaging is labeled as compostable, the following guidelines apply:

- Compostable packaging is intended for processing in suitable industrial facilities
- Home composting is generally not suitable
- Compostable packaging must not be disposed of in the environment

Disposal must be carried out in accordance with applicable local regulations.

7. Percentage of Recycled Materials

Some of our packaging contains recycled materials. The percentage varies depending on the type of packaging, the material, and the availability of suitable recycled materials. Binding product-specific information is provided separately, where necessary.

8. Information on Substances in Packaging

Our packaging complies with the applicable requirements of EU chemicals legislation, in particular Regulation (EC) No. 1907/2006 (REACH) and Regulation (EU) 2025/40, Article 5. Information pursuant to Article 33 of the REACH Regulation and Article 5 of the Packaging Ordinance is available upon request.

9. Measures to Prevent Packaging Waste

When developing our packaging, we take measures to reduce packaging waste, in particular:

- Limiting material use to the necessary amount
- Avoiding unnecessary packaging components
- Considering recyclability when selecting materials
- Optimizing packaging volume and weight

The complete elimination of packaging depends on product-specific requirements, particularly those related to protecting the packaged goods.

10. Availability of Additional Information

Additional, product-specific information will be provided upon request, provided that the relevant data is available and there are no legal or contractual obligations preventing its disclosure. Further information on packaging properties, material composition, or recycling instructions may also be provided in digital form in the future (e.g., via QR codes or websites).

Regulation (EU) 2025/40 assigns specific obligations regarding the conformity of packaging to the various economic operators in the supply chain, in particular producers, importers, distributors, and manufacturers. Compliance with these requirements is the responsibility of the respective economic operators within the supply chain.

Appendix 1 – Labels on Packaging – Examples



The number inside the recycling symbol indicates the material the packaging is made of. The letter code below the triangle represents the packaging’s material group. Markings that provide information on the material composition, among other things, must be used in accordance with Regulation (EU) 2025/40, Article 12, effective August 12, 2028, or 24 months after the regulation enters into force.

Examples:

Symbol	Code	Description	Examples	Disposal
	PET	Polyethylene-terephthalate	Packaging, plastic containers	Dispose of in the separate collection for plastic packaging
	PE-LD oder LDPE	Low-density polyethylene	Plastic film, plastic bags	Dispose of in the separate collection for plastic packaging
	PP	Polypropylene	Reel cores	Dispose of in the separate collection for plastic packaging
	PAP	Corrugated cardboard	Packaging, shipping cartons	Dispose of separately in the paper and cardboard collection
	PAP	Other cardboard	Packaging, shipping cartons	Dispose of separately in the paper and cardboard collection
	PAP	Paper	Packaging tape, packing material	Dispose of separately in the paper and cardboard collection
	Composites: C/X, where X is the abbreviation for the main component	Low-density polyethylene	ESD shielding bags	Dispose of in accordance with local regulations for composite packaging

RESY symbol

The RESY symbol guarantees that packaging made of paper, paperboard, and cardboard is recyclable. Packaging bearing this symbol is part of the take-back system operated by RESY-Organisation für Wertstoffentsorgung GmbH, which was developed specifically for transport packaging in the B2B sector. It serves as proof that this packaging complies with the requirements of the RESY system, which ensures proper collection, recycling, and reuse.



Universal recycling symbol

The three arrows arranged in a triangle symbolize the recycling loop. This is an internationally recognized, voluntary labeling system. The symbol is also known as the “Möbius strip” or “Möbius loop.” It indicates that the packaging is recyclable.

