

Statement on sustainability and PPWR compliance, Regulation (EU) 2025/40

Industrial Wood Packaging Solutions

Dear Customer,

This statement is issued with reference to the requirements laid down in Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR), amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

Based on the information and declarations obtained from its suppliers in relation to the industrial wood packaging units supplied to its customers — including wooden cases, wooden crates, wooden skids/bases and other wood packaging— as well as the related accessories, including plastic, metal and other components used to assemble, protect, close, secure, handle or mark the packaging unit,

Novello S.r.l. hereby declares as follows:

Article 5 – Requirements for substances in packaging

“Packaging placed on the market shall be so manufactured that the presence and concentration of substances of concern as constituents of the packaging material or of any of the packaging components is minimised, including with regard to their presence in emissions and any outcomes of waste management, such as secondary raw materials, ashes or other material for final disposal, and to the adverse impact on the environment due to microplastics.”

- Data collection from suppliers has been initiated and, to date, compliance has been confirmed for the entire packaging unit, including the wood and all related accessories (plastic, metal and other components; see Annex). All qualified suppliers confirm compliance with the applicable concentration limits for hazardous substances, including the heavy metals lead, cadmium, mercury and hexavalent chromium, within the overall limit of 100 mg/kg, as well as other substances subject to restrictions, in view of the application of the Regulation, currently scheduled from 12 August 2026.
- According to the declarations received from the relevant suppliers, the wood packaging and related accessories supplied do not contain PFAS (per- and polyfluoroalkyl substances) above the limits established by applicable legislation. Please note that the industrial wood packaging and related accessories covered by this statement are neither intended nor suitable for direct contact with food.
- This assessment also covers the non-structural components of the packaging unit, including marking inks and paints, adhesives, labels, desiccants and VCI (Volatile Corrosion Inhibitor) products, as these constitute packaging components for the purposes of Article 5. Compliance confirmation has also been obtained from the respective suppliers for these components.
- Should Regulation (EU) 2025/40, or any related implementing or delegated acts, introduce additional restrictions or obligations, Novello S.r.l. will update this statement accordingly and require its suppliers to implement any necessary measures within the prescribed deadlines.

Article 6 – Recyclable packaging

Wood is an inherently renewable material that is 100% recyclable and/or suitable for energy recovery at the end of its life cycle. The industrial wood packaging supplied by Novello S.r.l. is designed to allow the easy

manual or mechanical separation of secondary components and accessories, such as metal or plastic elements, thereby facilitating subsequent recycling operations.

To support the effective recycling and recovery of materials:

- Novello S.r.l. is duly registered with CONAI (Italian National Packaging Consortium) and is a member of Rilegno (Italian National Consortium for the Collection, Recovery and Recycling of Wood Packaging).
- The packaging placed on the market enters the national separate collection and mechanical recycling system, for example for the production of particleboard or other secondary raw materials.
- The industrial wood packaging supplied is generally compliant with the recyclability requirements laid down in Article 6, subject to the definition of the relevant Design for Recycling criteria, expected by 1 January 2028.
- Novello S.r.l. undertakes to implement the applicable recyclability criteria as soon as they are adopted and to inform its customers accordingly.

Article 7 – Minimum recycled content in plastic packaging

- Certain accessories forming part of the packaging unit are made of plastic materials, including plastic film, strapping, protective hoods and barrier bags (see Annex). According to the current regulatory provisions, these components are not subject to a mandatory minimum recycled-content requirement by 2030 or in subsequent years. Novello S.r.l. will monitor the adoption of the relevant implementing acts and will update this statement where necessary.

Article 10 – Packaging minimisation

“By 1 January 2030, the manufacturer or importer shall ensure that the packaging placed on the market is designed so that its weight and volume is reduced to the minimum necessary to ensure its functionality, taking account of the shape and material from which the packaging is made.”

- The design of the wood packaging supplied already takes into account the need to minimise weight and volume, while maintaining the mechanical strength and level of protection required to ensure safe handling and transport.

Articles 11 and 29 – Reusable packaging and re-use targets

“From 1 January 2030, economic operators that use transport packaging, or sales packaging used for transporting products [...] shall ensure that at least 40% of such packaging in total is reusable packaging within a re-use system.”

- The industrial wood packaging supplied by Novello S.r.l. — including wooden cases, wooden crates, wooden skids/bases and other wood packaging — is generally designed as single-use, non-returnable transport packaging, specifically engineered to provide the required level of protection for each individual load during handling, transportation and shipment. Such packaging is not originally placed on the market as part of a managed re-use, return or pooling system.
- Where the supply includes standard exchangeable or reusable pallets, such as pallets operating within EPAL/CP pools or rental systems, these may contribute towards the end customer's re-use

targets, provided that they are returned to and reintroduced into a recognised re-use system incorporating recovery and repair operations.

- Consumable packaging accessories, including plastic film, strapping, desiccants and similar items, are by their nature single-use and non-reusable.

Article 12 – Labelling of packaging

- The wood packaging supplied by Novello S.r.l. is already identified in accordance with the applicable industry marking standards, including ISPM 15 marking for phytosanitary treatment, where applicable.
- As soon as the implementing acts concerning the harmonised labelling requirements laid down in Article 12 are adopted — with application currently expected from 12 August 2028, or 24 months after the entry into force of the relevant implementing acts, whichever is later — Novello S.r.l. will adapt the labelling of its wood packaging accordingly.

Articles 8 and 9 – Bio-based feedstock and compostable packaging

- Article 8, concerning bio-based feedstock in plastic packaging, and Article 9, concerning compostable packaging, specifically relate to plastic packaging and therefore do not apply to the industrial wood packaging covered by this statement.

This statement is issued on the basis of the information currently available and the declarations provided by our suppliers and will be updated in the event of regulatory changes or changes to the products and accessories supplied.

Oggiona con Santo Stefano, 31 July 2026



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Annex – Main categories and types of accessories

The following table summarises the main categories of accessories used for the assembly, protection, securing and handling of the industrial wood packaging units supplied by Novello S.r.l., for which compliance data have been collected from the respective suppliers.

Accessory Category	Types of Components Included
Waterproofing and Corrosion/Moisture Protection	Protective hoods (PE, heat-shrink and VCI); barrier bags, including VCI/Valeno types; plastic film; PE/polyethylene sheets; polyethylene-coated paper; co-extruded film (COEX); bituminised paper; desiccant bags; VCI desiccants; corrosion inhibitors, including VCI powders.
Cushioning, Padding and Mechanical Protection	Bubble wrap; foam; expanded polystyrene; rubber; bonded foam pads; Stratocell; edge and corner protectors; flange protection discs; stretch film.
Load Securing, Closure and Structural Hardware	Plastic and steel strapping; lashing straps; seals; ropes; netting; metal corner protectors; galvanised sheet metal; brackets; through-bolts; hinges; toggle latches; eyebolts; handles; lashing rings; screws; tie rods; threaded rods; snap hooks/carabiners; angle brackets; coach screws/lag screws; castors.
Inspection and Ventilation	Inspection windows; inspection/access panels; ventilation grilles.
Assembly and Marking Consumables	Marking inks and paints; adhesives; labels.
Monitoring Devices and Document Holders <i>(Components not forming part of the packaging)</i>	Humidity indicators; tilt indicators/detectors; anti-tip devices; shock indicators/detectors; packing-list/document holders; data loggers.

The above list is current as of the date of this statement and may be supplemented in the event of changes to the range of accessories used.