



## Statement of Compliance – EU Packaging and Packaging Waste Regulation (EU) 2025/40

Cold Chain Technologies is committed to full compliance with Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), which applies across the European Union starting on August 12<sup>th</sup>, 2026.

As a provider of cold chain and thermal packaging solutions, we recognize the unique design and performance requirements of temperature-controlled packaging and are actively aligning our product portfolio and operations with the PPWR's requirements, including:

- **Packaging design and minimization:** Our packaging is designed to minimize void space and unnecessary material while maintaining the thermal performance and product protection required for cold chain integrity.
- **Recyclability:** We are working toward ensuring all packaging placed on the EU market achieves a recyclability grade of A, B, or C by the 2030 deadline, where technically and functionally feasible within the performance constraints of temperature-sensitive applications.
- **Recycled content:** Where compatible with the functional, safety, and performance requirements of temperature-sensitive applications, we are working to incorporate recycled materials into our packaging where technically feasible and where appropriate supply chain options exist.
- **Hazardous substance compliance:** Our packaging meets the PPWR's restrictions on PFAS and heavy metals (Lead, Cadmium, Mercury, Hexavalent Chromium combined  $\leq 100$  mg/kg), effective August 2026.
- **Conformity documentation:** We maintain the necessary compliance documentation for our packaging in accordance with PPWR requirements and retain records for the applicable periods as required by the regulation.
- **Extended Producer Responsibility (EPR):** We are registered or in the process of registering with the relevant national EPR schemes in EU Member States where we place packaging on the market and will appoint authorized representatives where required under Article 45.
- **Labelling:** We are preparing for the harmonized labeling requirements for recyclability, recycled content, and consumer sorting instructions, with phased implementation through 2028–2029.

Cold Chain Technologies recognizes that certain thermal packaging formats may qualify for derogations where reuse or recyclability requirements cannot be met without compromising product safety, temperature integrity, or regulatory compliance of the goods being protected. We are committed to engaging openly with our customers and relevant authorities on any such determinations as the regulatory framework continues to develop.

We will actively monitor PPWR implementing acts, delegated acts, and guidance from the European Commission as they are issued and will update our compliance documentation and customer communications accordingly.

Sincerely,  
Cold Chain Technologies  
Date: June 26, 2026  
Contact: QADocsReq@coldchaintech.com