

As stipulated in Paragraph 5, Art. 219 of the TUA (Legislative Decree No. 152 of 3 April 2006):

All packaging must be appropriately labelled in accordance with the methods established by the applicable UNI technical standards and in compliance with the determinations adopted by the Commission of the European Union, in order to facilitate the collection, reuse, recovery and recycling of packaging, as well as to provide correct information to consumers on the final destinations of packaging. Producers are also obliged to indicate, for packaging identification and classification purposes, the nature of the packaging materials used, based on Commission Decision 97/129/EC.

Under the definition of packaging are, as provided for in Article 218 of the TUA (Legislative Decree No. 152 of 3 April 2006):

a) packaging: the product, composed of materials of any nature, used to contain certain goods, from raw materials to finished products, to protect them, to allow their handling and delivery from the producer to the consumer or user, to ensure their presentation, as well as disposable items used for the same purpose;

b) sales packaging or primary packaging: packaging conceived so as to constitute, at the point of sale, a sales unit for the end user or consumer;

c) multiple packaging or secondary packaging: packaging conceived so as to constitute, at the point of sale, the grouping together of a number of sales units, irrespective of whether it is sold as such to the final user or to the consumer, or only serves to facilitate replenishment of the shelves at the point of sale. It may be removed from the product without altering its characteristic;

d) 'transport packaging' or 'tertiary packaging' means packaging designed to facilitate handling and transport of goods, from raw materials to finished goods, of a number of sales units or of multiple packagings in order to avoid handling and transport damage, excluding road, rail, sea and air containers.

Products delivered by Tecnica S.r.l. have the following types of packaging:

- Primary packaging = tool packaging, such as cutter boxes, chucks, bits, shanks, plastic bags, labels;
- Secondary packaging = n.a;
- Tertiary packaging = bubble wrap, cellophane, strapping, pallets, corrugated and non-corrugated cardboard, shipping chips, adhesive film, havana envelopes.

For specification of the components, see abbreviations in Table 1.

For this type of packaging, the note of the MATTM of 17 May 2021 "D.LGS. 3 September 2020, N. 116 Chiarimenti sull'etichettatura ambientale degli imballaggi di cui all'art. 219, comma 5 del decreto legislativo 3 aprile 2006, n. 152", as also taken from the document "Linee Guida sull'etichettatura degli imballaggi ai sensi dell'art. 219 comma 5 del D.lgs. 152/2006 e ss.mm" of 15/3/2022 published by the Ministry of Ecological Transition, clarifies:

"In order to guarantee the correct environmental labelling also of finished and sold packaging, directly from the producer, neutral, without graphics or printing, (e.g. transparent bags, non-personalized wrappings) and packaging for transport or tertiary packaging pursuant to art. 218, paragraph 1 letter d) of the TUA such as palletizing film, pallets, boxes or corrugated cardboard interlayers, it is necessary to consider a possible alternative to the traditional labelling to be affixed to the packaging itself. [...]"

For the aforementioned packaging, the obligation to identify the composition material of the packaging is considered fulfilled if the manufacturer includes this information on the transport documents accompanying the goods, or on other external media, including digital media."

Furthermore, the document "Guidelines on the labelling of packaging pursuant to Article 219 paragraph 5 of Legislative Decree 152/2006 as amended" dated 15/3/2022 published by the Ministry of Ecological Transition specifies that:

"Packaging intended for B2B, e.g. packaging intended for professionals, or packaging for transport or related to logistics or exhibition activities, may not present the information relating to the final destination of the packaging, but must

compulsorily report the coding of the composition materials in accordance with Decision 129/97/EC. All other information remains, however, voluntarily applicable."

Tecnica S.r.l. complies with the above provisions by summarizing the necessary information in Table 1 below:

PACKAGING COMPONENT	Coding of materials DEC 97/129/EC
PLURIBALL	LDPE 4
CORRUGATED CARDBOARD	PAP 20
NON- CORRUGATED CARDBOARD	PAP 21
ADHESIVE FILM	LDPE 4
PAPER LABELS	PAP 22
PAPER TAPE	PAP 22
ENVELOPES FOR TRANSPORT DOCUMENTS	LDPE 4
CARRIER SHIPPING ENVELOPE	LDPE 4
PLASTIC BAGS	LDPE 4
ELASTICS	LDPE 4
HAVANA ENVELOPES	PAP 22
CUTTER BOXES	PP 5
SPINDLE BOXES	PP 5
ADHESIVE LABELS	PET 1
FRAGILE TAPE	LDPE
POLYSTYRENE	PS 6
BANKS	FOR 50

Table 1 - Packaging components and identification codes

This declaration is communicated in electronic form to customers, suppliers and subcontractors by means of publication on the company websites.