



Packaging Guideline

Focus on Paper & Cardboard

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A1 Telekom Austria Group is committed to accelerating the shift towards a circular economy. As part of our journey to evolve into a truly circular business, we are taking concrete steps to reduce our environmental footprint. One of them is the transition to sustainable Packaging.

By prioritizing recyclable and renewable materials such as paper and cardboard and aligning with EU guidelines for Packaging design and waste reduction, we are helping to create a more resource-efficient and environmentally responsible value chain and truly contribute to the circular economy transition. This guideline is applicable to packaging material A1 Group buys and puts on the market.

Introduction: Sustainable Packaging

Sustainable Packaging focuses on maximizing the reuse and recovery of materials used. This is aimed at longevity and the full substitution of virgin materials with recycled or renewable alternatives. Sustainable Packaging design is rooted in the principles of circularity. Therefore, products should be designed and produced in a way, which after use, permits the recovery of materials to a high degree by employing it as secondary raw materials, the reuse of packaging, and the remanufacture of the packaging from renewable material sources

This Guideline has been updated to reflect the requirements of the EU Packaging and Packaging Waste Regulation (*PPWR, Regulation (EU) 2025/40*), which entered into force on 11th February 2025. The PPWR applies directly in all EU Member States and sets binding requirements for all companies placing packaging on the EU market, regardless of their place of establishment.

Focus area of Sustainable Packaging

The majority of our packaging is mainly made of paper and cardboard. That is why the quality criteria set in this document are mainly applicable for paper and cardboard. However, the use of plastic and its avoidance should also be kept in mind. A1 Group aims to make sure that the plastic packaging we procure and send to the customer can be reused, recycled or composted. We avoid using packaging material from polystyrene (PS), expanded polystyrene (EPS), polycarbonate (PC), polyvinyl chloride (PVC).

Main Principles for Sustainable Packaging Design

Materials and Additives

- The material used should be **as homogeneous as possible** (e.g. outer packaging as well as inner packaging made from paper) and free from additives
- **Use of mono materials** or **material combinations that permit recycling** is preferable
- Where possible, **recycled material** should be used
- All packaging materials should be **PFAS free** and **comply with the heavy metal concentration limits** according to the PPWR

Printing Ink, Glue and Decoration

- The printing ink used ought to be in conformity with the EuPIA Exclusion List
- Inks should be free from PFAS and substances restricted under Article 5 PPWR
- The packaging should be considered as a whole and should consist of a limited number of different materials or of material combinations that can be easily separated. (e.g. decoration stickers that can easily be removed)

Packaging Minimization

- Packaging should be reduced to the minimum necessary to fulfil its protective, logistical and marketing function
- The empty space (void space) in packaging ought not exceed 50% of the total packaging volume (mandatory from 01.01.2030)
- Unnecessary packaging components such as double walls, false bottoms and gratuitous inner layers are to be avoided
- Suppliers should demonstrate compliance with packaging minimization requirements through technical documentation

Recycling Requirements (Art. 10 PPWR)

From 01 January 2030, all packaging placed on the EU market must meet the Design for Recycling criteria to be defined in a delegated act by 01 January 2028. Packaging is assessed and assigned to a performance grade based on its recyclability by weight:

Performance Class	Recyclability (Weight Share)	Market Allowance
Grade A	≥ 95%	Unrestricted allowable
Grade B	≥ 80%	Unrestricted allowable
Grade C	≥ 70%	Allowed until 31.12.2037 – then prohibited
Not recyclable	< 70%	Prohibited from 01.01.2030 – not to be produced

Packaging is considered recyclable if it (a) is designed for material recycling, enabling the use of secondary raw material of sufficient quality to substitute primary raw materials, and (b) can be separately collected, sorted into specific waste streams and recycled at scale.

Future Outlook

As the PPWR continues to be rolled out, the requirements for sustainable packaging will become increasingly stringent. From 2028 onwards, all packaging must carry harmonised labelling indicating material composition and disposal instructions. From 2030, mandatory minimum recycled content thresholds will apply to plastic packaging, and full recyclability compliance across all performance grades will be enforced.

A1 Group will update this Guideline accordingly as implementation acts are adopted by the European Commission.

Quality Criteria for Paper and Cardboards

To be considered as “sustainable packaging”, the packaging must match the standard “very good” or “good” in all eight categories (“origin of fibres”, “coating”, “Application of glue”, “ink”, “print” “inner packaging” and “decoration”, “manuals”). Please provide evidence documents, e. g. if the origin of fibres is 100% from recycling fibres – please provide proof.

Categories		very good	good	poor
Outer Packaging	Origin of fibres	90-100% Recycling fibres (wood)	Paper/ cardboard with FSC / PEFC label or >70% recycling fibres	Non-woody plants such as hemp, grass, cotton etc.
	Coatings	Without any coating	Without any coating	Plastic coating on both sides
	Glue	No glue used	No glue used	Glue used
	Ink	90-100% mineral oil free - EuPIA-compliant ink* - PFAS-free	- More than 80% Organic oil based (e. g. soja, herb oil etc.) - Exclusion of palm oil in in - EuPIA-compliant ink* - PFAS-free	Over 50% mineral oil based ink
	Print	Single color print	Maximum of two-color print	Multi color print
Inner packaging & other material	Inner packaging	Paper or cardboard based material as inner packaging Zero plastic for inner packaging PFAS-free	If plastic is used as a inner material it must contain 80-100% of recycled plastic PFAS-free	Plastic is used
	Decoration	No stickers unless necessary ones e.g. with serial number No additional give aways	No stickers unless necessary ones, e.g. with serial number No additional give aways	Stickers Additional give aways
	Manuals	Manuals and information material online only (unless legally required) No further advertising or other material (unless legally required ones)	Manuals and information material are printed environmentally friendly (see “origin of fibre”, “coating”, “ink”) – 4 color print possible	Manuals are not printed environmental-friendly

*More Information on the EuPIA guidelines see www.eupia.org