

22/07/26

To Whom It May Concern:

Sinclair has received an unprecedented level of demand for various documentation in response to the implementation of the EU's packaging and packaging waste regulation (2025/40). These include specific inquiries into:

- Information on recycled content and recyclability
- Compostability (Article 9)
- Heavy metals and PFAS (Article 5)
- Substances of very high concern (SVHC)
- Bisphenols
- Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)

Sinclair has thoroughly reviewed our own products and procedures and can continue to assure all its customers that their labels are safe and comply with these and other legislations relevant to the application of fruit labelling.

This document exists as a "frequently asked questions and requested documentation" during the implementation period of PPWD 2025/40 and is formed by collation of responses to specific individual requests..

Recyclability (article 6) and recycled content (Article 7)

By way of derogation from Article 6(1) Fruit and vegetable stickers are subject to the mandatory compostability provisions of Article 9 PPWR by 12 February 2028. Additionally, compostable plastic packaging is specifically exempted from minimum recycled content in Article 7, 4.(e)

Therefore all Sinclair labels are not recyclable and do not contain recycled content, specific information on this is available on label specific specification sheets available from customer service.

Compostability (Article 9)

In the declaration of compliance (DoC) for Sinclair products T42, T28 & T25, Regulation (EU) 2025/40 was not referenced in its entirety. This approach was taken deliberately.

The product complies with Article 5 of Regulation (EU) 2025/40, which sets out requirements relating to the restriction of hazardous substances, including obligations concerning PFAS and heavy metals. Compliance with Article 5 is therefore explicitly stated in the respective DoC.

However, the product does not comply with Article 9, which concerns the mandatory industrial compostability of certain packaging components, including fruit labels. The relevant requirements under Article 9 apply only from 11th February 2028

To avoid potential confusion or misinterpretation - such as implying full compliance with the Regulation while excluding specific provisions - T25 DoC refers to Article 5 only. This makes clear which regulatory requirements are met in each case.

From 11th February 2028 onward, as the product will not comply with Article 9, it will not be accurate to claim compliance with Regulation (EU) 2025/40 (PPWR) as a whole. Nevertheless, it will remain correct to state compliance with Article 5, including its provisions on PFAS and heavy metals.

Heavy metals and PFAS (Article 5)

Sinclair has thoroughly reviewed our own products and procedures and confirm;

- *Absence of intentionally added PFAS,*
- *Test results in accordance with the methodology required by the PPWR (TF, GC/MS, targeted PFAS analysis + TOP test), meet legislative requirements*
- *Test results in accordance with the methodology required by the PPWR (ICP – Heavy metals), meet legislative requirements; Total of Pb + Cd + Hg + Cr > 100 ppm*

Current reports from accredited laboratories are on file internally

- *Full traceability of individual materials and supervision of subcontractors.*

For the following laminates;

Label
Type 25
Type 28
Type 42
Type 50
Type 55

Substances of Very High Concern

Sinclair has become aware of a specific inquiry into compliance against Europe Substance of Very High Concern (SVHC), Candidate List (Annex XIV), updated on 21 January 2025 (General) Europe.

The Candidate List of substances of very high concern (SVHC) now contains 247 entries for chemicals that can harm people or the environment. Under **REACH**, companies have legal obligations when an included substance is used – either on its own, in mixtures or in articles – in the Candidate List.

If an article contains a Candidate List substance above a concentration of 0.1 % (weight by weight), suppliers must give their customers and consumers information on how to use it safely.

Sinclair has thoroughly reviewed our own products and procedures and can continue to assure all its customers that their labels are safe and comply with this and other legislation relevant to the application of fruit labelling.

Bisphenols

Sinclair and its suppliers of inks, coatings and other raw materials do not intentionally add Bisphenols A/F/S as ingredients in the manufacturing of its products. Therefore, they are not expected to be present in the final composition. If these substances happen to be present, they likely would be present only at a trace level. Because we do not routinely analyze our products for these substances, we cannot state categorically that the materials are “free” from these substances.

Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)

Sinclair and our suppliers do not intentionally add Mineral Oil Saturated Hydrocarbons and Mineral Oil Aromatic Hydrocarbons as ingredients in our products; therefore, these compounds are not expected to be present in the final composition. We do not routinely analyze our products for these substances; therefore we cannot state that our materials are “free” from these substances.

The information contained in this letter is provided in good faith and to the best of our knowledge and is based in part on information provided by our suppliers. Please do not hesitate to contact me should you need additional information.

Sincerely,



John Ryan
Laminate Development Manager