

Sinclair Systems International LLC
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Fresno, CA 93725
USA



Sinclair International Ltd.
Jarrold Way, Bowthorpe
Norwich NR5 9JD
UK

19/05/26

To Whom It May Concern:

Sinclair has become aware of a specific inquiry into Compliance of fruit labels to PPWR Articles 5 & 9:

In the declaration of compliance (DoC) for Sinclair product 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 T25.

However, the product does not comply with Article 9, which concerns the mandatory industrial compostability of certain packaging components, including fruit labels. The requirements under Article 9 apply only from August 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 12 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.

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,

A handwritten signature in black ink that reads 'John Ryan' with a stylized initial 'JR' to the left.

John Ryan
Laminate Development Manager