

12 May 2026

TO WHOM IT MAY CONCERN

Product Safety Declaration of Compliance (BRCP035-7/2)

Label Pro Industries (PTY) Ltd, alongside Fruit Label Pro (PTY) Ltd, hereby declares that all manufactured products—namely:

-  Adhesive paper and polypropylene labels
-  Printed tags
-  Flexographic fruit wrappers
-  Compostable cellulose-based labels

are produced under a certified and compliant Food Safety and Quality Management System, in accordance with the latest requirements of BRCGS Packaging Materials Issue 7 and are suitable for use in primary and secondary labelling of food products, including direct contact with fresh produce.

Regulatory Compliance

BRCGS Clause Reference:

- 3.3.2 – Legal compliance
- 3.7.2 – Raw material specifications
- 3.7.3 – Product conformity
- 3.7.4 – Changes to specifications
- 3.7.5 – Verification of raw materials
- 4.6.1 – Environmental claims

Aligned Legislation and Regulations:

- EU 1935/2004: Framework Regulation for food-contact materials
- EU 10/2011: Plastics Regulation (including 2025 Annex updates)
- EU 2023/2006: Good Manufacturing Practice
- EU 2022/1616: Recycled plastics legislation
- EU 2024/3190: Bisphenol A restrictions in food-contact materials
- EU 2023/1442 & EU 2023/1627: Amendments to migration testing and compositional conformity for FCMs
- EU 2025/40: Packaging and Packaging Waste Regulation (PPWR) – compliance with recyclability, reuse, and extended producer responsibility requirements.
- REACH: Annex XIV/XVII – Substances of Very High Concern
- FDA 21 CFR 176.170, 175.105: Indirect food contact
- German LFGB (Lebensmittel- und Futtermittelgesetzbuch): National food-contact safety requirements
- German VerpackG (Packaging Act): Extended Producer Responsibility and recyclability obligations

We confirm:

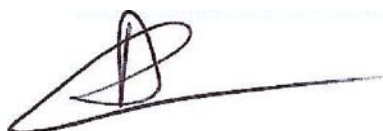
- All raw materials, including those used for fruit wrappers and compostable labels, are virgin and food-contact approved under intended conditions.
- No materials used contain restricted substances such as:
 - Heavy metals
 - Fluorinated compounds or PFAS
 - Hydrocarbons (MOSH/MOAH)
 - Phenolic compounds or chlorates
- No recycled plastics are used unless fully validated in accordance with EU 2022/1616.
- All changes to specifications are managed via documented revision control and customer notification, as per Clause 3.7.4.
- REACH compliance is maintained through supplier declarations and material verifications.
- Compliance with German VerpackG ensures recyclability and reporting under national packaging registers.

 Recyclability & Environmental Assurance

BRCGS Clause Reference:

- 4.6.1 – Environmental claims
 - 3.3.2 – Legal compliance with national recycling programs
- All packaging components supplied by Label Pro are recyclable as part of the host packaging system and support Extended Producer Responsibility (EPR) frameworks. Compostable options are available for sustainability-focused applications with verified recovery pathways.
- Verified alignment with German VerpackG and EU Circular Economy Action Plan (2025 updates).

Signed:



Andries Pretorius
Managing Director
Label Pro Industries (PTY) Ltd