

Regulatory Statement On the absence of MOSH and MOAH in the SunPak FSP EcoPace range

To whom it may concern

Sun Chemical Regulatory and Product Stewardship department have examined the following SunPak FSP EcoPace products:

FEB18 FEB35 FEB36 FEB53 FEB17 FEB21 FEB33 FEB37 FEB42 FEB50 FEB54 FEB66 FEB71 FEP25 FEP26 FEP27 FEP29 FEP46 FEP89

Article 112 of the French Decree No. 2020-1725 on the 'Fight Against Waste and the Circular Economy' regulates the use of mineral oil on packaging and free advertising. The article prohibits mineral oil containing substances that interfere with waste recycling and provides the following definitions:

- MOH = Mineral Oil Hydrocarbons
- MOAH = Mineral Oil Aromatic Hydrocarbons consisting of 1 to 7 aromatic cycles
- MOSH = Mineral Oil Saturated Hydrocarbons consisting of 16 to 35 carbon atoms

The first restrictions came into force from 01/01/2023 and run till 01/01/2025 wherein MOH containing more than 1% of MOAH is banned. Then from 01/01/2025 MOH containing more than 0.1% of MOAH (1-7 aromatic cycles) (or more than 1 ppm of MOAH (3-7 aromatic cycles)) or more than 0.1% of MOSH (C16-C35) is banned.

To the best of our knowledge, the above listed products are compliant to the thresholds for petroleum hydrocarbon derived MOSH and MOAH for 2023 and 2025, however, it is not possible to state compliance to the 1 ppm limit for of MOAH of 3-7 aromatic cycles due to reasons specified in the separately attached statement regarding our concerns with the decree.

This information is obtained from the individual raw material suppliers' regulatory disclosures, regarding the composition of each raw material supplied to manufacture the above products.

On behalf of Sun Chemical Callum Parkins Product Stewardship Sun Chemical Ltd. 17/04/2024

Disclaimer:

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