# PPWR Material Information and Supplier Compliance Summary

**Northern Labels Ltd | NL-PPWR-001 | Version 1.2 | 19 November 2026**

Regulation (EU) 2025/40 on packaging and packaging waste

This summary helps customers select our principal stock label constructions and understand the supplier information held for those materials and our corrugated transit cartons. The schedules identify the exact constructions covered; application conditions remain essential.

**This is supplier information, not an EU declaration of conformity under Article 39 and Annex VIII. It does not replace any declaration required for packaging placed on the EU market.**

## Basis of information

We hold manufacturer specifications and compliance statements for the listed materials, including the November 2026 HERMA updates. These describe materials as supplied. Northern Labels does not manufacture the raw laminates or board; our conversion processes and any added inks, coatings or laminates must also be considered when assessing a finished label. Supplier information may change.

## Substances of concern

Supplier documentation addresses the Article 5 restrictions on lead, cadmium, mercury and hexavalent chromium, and provides PFAS information. HERMA's heavy-metals statement covers its self-adhesive range; its PFAS statement is limited to materials approved for food-contact uses. Fedrigoni's statement has product and processing qualifications. Consult the applicable statement and construction-specific conditions for any food-packaging requirement.

## Recycled content

Recycled-content percentages have not been established for the label constructions listed here; this does not mean zero recycled content. Article 7(5)(b) exempts a plastic part below 5% of the whole packaging unit's weight from the Article 7(1) and (2) minimums. Eligibility needs a documented packaging-weight calculation. This is not a universal label-size or recyclability limit.

Article 7(1) minimums apply from 1 January 2030 or three years after the relevant implementing act enters into force, whichever is later.

## Recycling and material selection

Use the minimum practical label material and match it to the packaging's intended recycling stream. Prefer compatible fibre labels for fibre packaging and compatible plastic or appropriately removable labels for plastic packaging. The complete pack, including adhesive, printing, coatings and product residue, determines recyclability; there is no universal label-coverage percentage.

Detailed Article 6 design-for-recycling criteria are due through delegated acts by 1 January 2028. The relevant requirements apply from 1 January 2030 or 24 months after those acts enter into force, whichever is later. Sticky labels on fruit and vegetables require separate assessment against Article 9 compostability requirements from 12 February 2028.

## Using this information

The food-use descriptions on pages 2 and 3 summarise supplier permissions, not unrestricted approval of a finished printed label. Paper, film and adhesive conditions must all be met. Customers should identify the food type, contact route, storage conditions and packaging construction so the intended use can be reviewed. This summary does not certify a customer's complete pack or remove the responsibilities of any party for its own products or processes.

## Paper and direct thermal materials

Manufacturer compliance information and matching specifications are held for all rows. Recycled content is not established. Food uses below are subject to the notes and the full supplier specifications.

| Supplier and code | Exact construction | Face material | Documented food uses |
|---|---|---|---|
| HERMA 14583 | 912 / 62Dps / 515 | HERMAtherm top M; phenol-free, FSC Mix | Restricted thermal use; note 1 |
| HERMA 11677 | 918 / 62Dps / 515 | HERMAtherm top R; phenol-free, FSC Mix | Washed or peeled foods only; note 2 |
| Fedrigoni PUN0038 | Vellum SC FSC / P1000 / YG60 | Matt paper, FSC | Dry or moist, non-fatty foods |
| Fedrigoni PUN0101 | Vellum SC FSC / RF20 / YG60 | Matt paper, FSC | Dry or moist, non-fatty foods |
| Fedrigoni PCD0052 | Coated 80 FSC / P1000 / YG60 | Semi-gloss paper, FSC | Dry or moist, non-fatty foods |
| Fedrigoni PCD0108 | Coated 80 FSC / RF20 / YG60 | Semi-gloss paper, FSC | Dry or moist, non-fatty foods |
| Fedrigoni PDT0005 | Thermal Eco BPA Free / P1000 / YG60 | Direct thermal eco paper, BPA free | Food-pack labelling; no direct face contact |
| Fedrigoni PDT0018 | Thermal Eco BPA Free / RF20 / YG60 | Direct thermal eco paper, BPA free | Food-pack labelling; no direct face contact |
| Fedrigoni PDT0211 | Thermal Top / P1000 / YG60 | Top-coated thermal paper | Washed, shelled or peeled foods; note 3 |
| Fedrigoni PDT0272 | Thermal Top Phenol Free / RF20 / YG60 | Phenol-free top-coated thermal paper | Washed, shelled or peeled foods; note 3 |
| HERMA | 601 / 62D / 523 | Matt white paper | Paper: dry or fatty foods; note 4 |
| HERMA | 601 / 62Gpt / 523 | Matt white paper | Paper: dry or fatty foods; note 4 |
| HERMA | 242 / 62D / 523 | Semi-gloss white paper | Paper: dry, non-fatty foods; note 4 |
| HERMA | 242 / 62Gpt / 523 | Semi-gloss white paper | Paper: dry, non-fatty foods; note 4 |
| HERMA | 242 / 42N / 523 | Semi-gloss white paper | Paper: dry, non-fatty foods; note 4 |
| HERMA | 243 / 62Dps / 523 | Semi-gloss white paper | Paper: dry or fatty foods; note 4 |

### Food use conditions

1. HERMA 912: direct paper contact is restricted to foods typically washed, shelled and/or peeled before consumption; a functional barrier is specified for other food-contact uses. Adhesive conditions in note 4 apply.

2. HERMA 918: direct paper contact is restricted to foods washed and/or peeled before consumption. Adhesive conditions in note 4 apply.

3. Fedrigoni PDT0211 and PDT0272: restricted food contact as shown; P1000 and RF20 adhesives are suitable for dry and moist, non-fatty foods. PDT0005 and PDT0018 thermal faces are not intended for direct food contact.

4. HERMA adhesives: food storage at room temperature or below. For fatty foods, 62D requires a correction factor of at least 4; 62Gpt and 62Dps require at least 3. Follow supplier migration and lamination conditions. The broader adhesive permissions, including those for 42N, do not extend the paper's permissions.

P1000, 62D, 62Gpt and 62Dps are permanent acrylic adhesives; RF20 and 42N are removable acrylic adhesives. FSC descriptions identify supplier material grades; confirm the applicable supply claim when ordering.

For paper recycling, minimise non-fibre additions and check repulpability, fibre yield and adhesive residues for the complete pack. A paper face alone does not establish recyclability.

## Film materials and transit cartons

Manufacturer compliance information and matching specifications are held for these film constructions. Recycled content is not established.

| Supplier and code | Exact construction | Face material | Documented food uses |
|---|---|---|---|
| Fedrigoni FLM1171 | PP TCX Gloss Clear 50 / AP901 / WG62 | Gloss clear PP; nominal 50 micrometres | Conditional direct contact; see below |
| Fedrigoni FLM1517 | PP TCX Gloss White Cav 60 / AP901 / WG62 | Gloss white cavitated PP; nominal 60 micrometres | Conditional direct contact; see below |
| HERMA 16257 | 881 / 62Xpc / 517 | Gloss white PP | Food-use conditions below |
| HERMA 17678 | 884 / 62Xpc / 520 | Gloss white lightweight PP | Food-use conditions below |
| HERMA 16436 | 886 / 62Xpc / 517 | Gloss clear PP | Food-use conditions below |

### Film food use and recycling

Fedrigoni FLM1171 and FLM1517 specifications permit direct contact with dry, moist and certain fatty foods, with a correction factor of at least 3. HERMA film specifications state food-contact compliance; adhesive 62Xpc permits specified dry, moist and fatty-food uses at room temperature or below, with a fatty-food correction factor of at least 3. Follow the full supplier conditions. AP901 and 62Xpc are permanent acrylic adhesives.

Film thicknesses shown for Fedrigoni are nominal product designations; typical specification values are 47 micrometres for FLM1171 and 57 micrometres for FLM1517. Check the current specification for application design.

Select film and adhesive for the actual recycling stream; suitability for application to a substrate does not establish recycling compatibility. Supplier compatibility information is application-specific and does not certify every printed label or finished pack. Printing, other components and residue can change the result.

### Corrugated transit cartons

| Evidence | Supplier information and scope |
|---|---|
| Zetland Boxes | Supplier-declared recycled-fibre figure: 70%. The supplier reports its board grades as recyclable and non-fibre content below 5%, with wheat-starch adhesive. This is a general supplier declaration, not a measured figure for each finished carton. |
| SCA Containerboard | For the paper grades covered: cadmium <0.5 mg/kg; total chromium <5 mg/kg; mercury <0.25 mg/kg; lead <5 mg/kg. SCA reports compliance with the combined 100 mg/kg heavy-metals limit; measured total chromium includes chromium VI. |

The SCA results apply to specified papers and do not establish PFAS compliance of every finished carton. Confirm the relevant carton grade and additions for the intended use; finished-pack recyclability depends on the complete construction. This summary covers corrugated cartons, not kraft packing paper or other transit components.

### Supporting records and enquiries

Records held include manufacturer PPWR and Article 5 statements, construction-specific TDS/TIS, general compliance and supplied REACH information, UPM guidance, paper-recycling guidance and selected compatibility assessments. Relevant information can be reviewed on request, subject to supplier sharing conditions.

**For a specific construction or application, contact Stuart Wilson, Managing Director: stuart@northernlabels.co.uk | 01535 635742.**

Legal references: Regulation (EU) 2025/40, Articles 5, 6, 7, 9 and 39 and Annex VIII; Commission Notice C/2026/3084. Current supplier conditions take precedence over these abbreviated material descriptions.