Date: November 9, 2026

Subject: EU Packaging and Packaging Waste Regulations (EU) 2025/40 (PPWR) and US Toxics in Packaging Clearinghouse (TPCH)

EU PPWR (Packaging and Packaging Waste Regulation) is a mandatory, union-wide regulation that goes far beyond chemical restrictions to enforce a circular economy. While it mirrors the 100 ppm heavy metal limit, it also introduces strict requirements for recyclability by 2030, minimum recycled content targets for plastics, and mandatory waste reduction goals. Unlike the TPCH, the PPWR also regulates packaging design (such as "empty space" limits) and requires harmonized labeling to assist with consumer sorting and recycling.

US TPCH (Toxics in Packaging Clearinghouse) is a model legislation adopted by 19 U.S. states that focuses strictly on prohibiting hazardous substances in packaging. It mandates that the sum of four heavy metals (lead, mercury, cadmium, and hexavalent chromium) must not exceed 100 ppm, and its 2021 update further prohibits the intentional use of PFAS and ortho-phthalates. Compliance is primarily managed through a Certificate of Compliance (CoC) provided by the supplier to the purchaser.

Based on information from Banner's packaging suppliers and to the best our knowledge, we declare that the packaging and packaging materials for Banner item(s) as in the table below:

Banner Item	Banner Item Description	Declaration for Packages
Inline Fiber Optics	BT*, BA*, IA*, IT*, BF*, BM*, BP*, BR*, BH*, DB*, IF*, IH*, IM*, IP*, IR*, TB*, TGR*, TIR*, TLR*, TT* and VFT-*	Compliant

Should you have any additional questions please contact Compliance Team at bannercompliance@bannerengineering.com.

Sincerely,

John McMahon
Director of Regulatory Compliance
Banner Engineering