

19 September 2025

SYMPHONY ENVIRONMENTAL TECHNOLOGIES PLC

("Symphony", the "Company" or the "Group")

EPA Ireland Update

Symphony Environmental Technologies Plc (AIM:SYM), global specialists in technologies that make plastic and rubber products "smarter, safer and sustainable," is making this further update.

On 8th July 2025 Symphony announced that it had received confirmation from the Environmental Protection Agency of Ireland ("EPA") as follows:

"We can confirm that d2w products do not fall within the scope of the Single-use Plastics Directive (EU) 2019/904, which prohibits the use of certain plastic materials due to their contribution to microplastic pollution. The d2w technology has been scientifically demonstrated to undergo full biodegradation without leaving behind persistent microplastics or toxic residues. This conclusion is supported by independent studies and aligns with the objectives of the Directive to reduce plastic pollution and promote sustainable alternatives."

Furthermore, the EPA said "we have reviewed the Commission Notice (2021/C 216/01) published in the Official Journal of the European Union on 7 June 2021, which provides Guidelines on the implementation of the Directive. Based on the evidence submitted, we are satisfied that d2w products are not subject to the restrictions outlined in the Directive or its accompanying Guidelines."

Symphony has now been informed by the EPA that it has no function to issue an assurance that a product is outside the scope of Article 5 of Directive (EU) 2019/904, and Symphony has received an apology. In Symphony's view it follows that the EPA has no function to decide whether a product is within the scope of Article 5, but officials in the EPA consider that they should follow the Guidelines, which in their view bring d2w plastic products within the scope of Article 5.

The EPA has however accepted that these Guidelines are not legally binding and has not disputed that they were written without the benefit of subsequent scientific evidence. It has also accepted that the General Court of the EU (in the case brought by Symphony against the EU Institutions) "did not make a determination as to whether the [d2w] Product is oxo-degradable plastic or not."

For the following reasons Symphony considers that the Guidelines are demonstrably incorrect: Recital 15 says "this Directive should cover products made from oxo-degradable plastic, as that type of plastic does not properly biodegrade and thus contributes to microplastic pollution in the environment." It follows therefore that plastics that have been scientifically demonstrated to undergo full biodegradation without leaving persistent microplastics or toxic residues are not oxo-degradable plastic for the purposes of the Directive.

The EPA has not changed its earlier position that "d2w technology has been scientifically demonstrated to undergo full biodegradation without leaving behind persistent microplastics or toxic residues."

As to Art.3(3) of the Directive, the EPA has not disputed the scientific evidence produced to it that (a) the d2w masterbatch does not "lead to" anything – as the process of oxidation would occur anyway, and even if it did (b) the plastic does not fragment into microplastics, and (c) there is no chemical decomposition.

Symphony has been advised by Mr. Josh Holmes KC that the Directive can and should be interpreted so as to allow products made with d2w technology to be placed on the market in the EU.

Enquiries:

Symphony Environmental Technologies Plc

Michael Laurier, CEO
Ian Bristow, CFO
www.symphonyenvironmental.com

Zeus (Nominated Adviser and Broker)

David Foreman, Emma Burn (Investment Banking)

Tel: +44 (0) 203 829 5000

NOTES TO EDITORS

About Symphony Environmental

Symphony's d2w masterbatch technology is added to polyethylene (PE) and polypropylene (PP) products at the manufacturing stage at little or no extra cost, and ensures that if they get into the environment at the end of their useful life they will not create microplastics and lie or float around for decades. Instead they will safely biodegrade, leaving no microplastics or toxicity. If they get collected during their useful life they can be recycled with ordinary PE and PP without separation See <https://www.biodeg.org/subjects-of-interest/recycling-2/>

Symphony also supplies a range of plastic technologies under its d2p (designed to protect) brand www.d2p.net to provide protection against insects, viruses, bacteria, fungi, rodents, odours, and fire. It has also introduced a new product under its NbR brand <https://www.symphonyenvironmental.com/natural-biodegradable-resin/> to reduce the amount of fossil-derived material in plastic products.

Symphony has a diverse and growing customer-base and has established itself as an international business with over 70 distributors around the world. Products made with Symphony's plastic technologies are now available in nearly 100 countries and in many different product applications. Symphony itself is certified according to ISO9001 and ISO14001.

Symphony actively participates in the Committee work of the British Standards Institute (BSI), the American Standards Organisation (ASTM), the European Standards Organisation (CEN), and the International Standards Organisation (ISO).

Further information on the Group can be found at www.symphonyenvironmental.com and twitter @SymphonyEnv

See also Symphony on Instagram and LinkedIn.