
DECLARATION OF CONFORMITY

Article: Sheets of transparent PET film - 600 x 400 mm

Customer: Bruyere

Customer art. ref.: 44665050 FEUILLES RHODOIDES 60X40CM 100PCES=PAQUET
100MICRONS**haute brillance

1. General

We confirm that above mentioned film is suitable for the production of packaging material for food packaging applications.

They are in accordance with good manufacturing practice for materials and articles intended for food packaging applications EC- 2023/2006 and comply with the EC-Regulation 1935/ 2004 (including Articles 3, 11(5), 15 and 17).. The manufacturing of Polyester film is in compliance with PIM regulation 10/2011 including amendments

321/2011,1282/2011, 1183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/213, 2018/831, 2019/37, 2019/1338, 2020/1245, 2023/1442, 2023/1627 and as well as the FDA-Regulation 21 CFR § 177.1630 in the current valid version/s,

Only monomers and additives are used which are indicated in mentioned EU regulation PIM 10/2011 including its amendments. For further details to the implementation of PIM 10/2011 please note §2 of this Declaration of Conformity.

Note: For all the film types mentioned above, Coated side of the film if applicable, are not for used in direct food contact. All types of coating/Treatments are specifically designed for improving specific features like adhesion with ink/adhesive or coatings and other functionalities.

2. Migration

Migration testing compliance according to (EU) No.10/2011 regulation based on migration testing using food Simulant and test conditions established in the PIM.

Migration values conformity was expressed in mg/kg applying a surface to volume ratio of 6 dm² per kg of food.

2.1 Overall migration limit :

Overall migration testing according to regulation (EU) No. 10/2011 (inclusive of all amendments and supplements) is made. The area limiting value of 10 mg/dm² is maintained under the following test conditions:

Food Simulant	Test Conditions (Time / Temperature)
Simulant A : 10 % Ethanol	OM6 : 4 h at 100 °C
Simulant B : 3 % Acetic Acid	OM6 : 4 h at 100 °C
Simulant D2: Vegetable Oil (Olive Oil)	OM7 : 2 h at 175 °C

OML (Overall Migration limit) has been tested for all type of foods in worse condition as per regulation (EU) no. 10/2011 including all amendments. (The overall migration limit of 10 mg per 1

dm2 results for a cubic packaging containing 1kg of food to a migration of 60 mg per kg food). Packed food storage conditions: Mentioned films passes OM6 as well as OM7 which covers food contact conditions described for OM1, OM2, OM3, OM4, OM5. It represents the worst case conditions for fatty food simulants in contact with non-polyolefin.

2.2 Specific migration limit (SML) and maximum permitted quantity of “residual” substance (QM) or (QMA)

The required SML- and/or QM or QMA- limits according to EU Regulation PIM 10/2011(inclusive of all amendments and supplements) are met.

Simulant / Test Method	Test conditions (Time/ Temperature)
Simulant B (acetic acid 3% (w/v))	10 days at 60°C + 8 h at 100°C
EN13130/HPLC, GC-MS, HPLC-UV	Extraction / Residual Content

Migration values conformity was checked in mg/kg applying a surface to volume ratio of 6 dm 2 per kg of food.

- Ref to Article 19 of Regulation 10/2011 regarding NIAS (Impurities and degradation products) we like to mention that the film has been tested and evaluated using 10 PPB screening with 95% ethanol (v/v) 10 days at 60 Deg. With GC-MS as well as other related methods and we confirm that no such substances identified which are subject to limitations.
- The film has been evaluated for Annex II substances from ingredient and all other possible sources and risk assessment has been carried out for presence of NIAS and they are found absent or they are not exceeding specified migration limits for the substances present in the film. We confirm absence of any substances with Genotoxicity

2.3 Coating

The employed coatings comply with the Council of Europe-Resolution AP (2004) 1 and/ or the FDA- Regulations (FDA 21 CFR) § 178 indirect food additives adjuvants, production aids and sanitizers and 21CFR§177 indirect food additives

2.4 Others

Please note that it is the responsibility of both the manufacturer of the finished food contact articles as well as the industrial food packer to ensure that the finished articles are in actual compliance with the specific and global migration limits. Our tests on the film cannot replace migration tests on the finished articles.

3. Hygiene

We have established hygiene, cleaning/Housekeeping, and pest control-plan, which may be audited as agreed. The production of the packing materials takes place under conditions of good hygiene practice, in particular for the determining of potential dangers, the assessment of the involved risks and a system to control detected dangers (chemical, physical and micro-biological risks in case of HACCP) for the use with food stuffs. Hygiene certification according to BRCGS/FSCC 22000.

4. Heavy Metals

We confirm that heavy metals as cadmium, mercury, lead and chromium⁶⁺ as such and their compounds are not used in the manufacturing. The sum of these heavy metals from possible contaminations is below 100 ppm and complies with EU RoHS Directive 2011/65/EU, RoHS2 and

RoHS 3, amending directive 2002/95/EC, 2004/12/EC and 2015/863/EU (Including four new phthalates.

They comply with directive 94/62/EC and its amendment 2005/20/EC (on Packaging and packaging waste), with the CONEG Legislation (update to their Model Toxics in Packaging Legislation, 2021) in the USA as well as

EN71, EN71/9.

We confirm that the film does not contain any substances listed under Restriction of Hazardous Substances (RoHS 2) 2011/65/EU Annex II

5. Other Substances

For the production no dangerous substances and no recycled contents are used. The polyester film also in conformance to EC 450/2009 no any active or intelligent materials present in the film. In particular we certify that for the manufacturing of our film none of the substances listed in Appendix 1 are employed and that the manufacturing process complies with the regulations listed in Appendix II.

We confirm that no any manufacturing sites of mentioned films are from sites considered as radioactive.

6. Dual use Substances

With regard to dual-use substances which are authorized as direct food additives or as food flavourings we state that this material complies with the purity criteria on food additives concerning colours, sweeteners and others as laid down in Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008. Following dual use additives are present in the film in respective type specified:

Silicon Dioxide (SiO₂), CAS no- 7631-86-9-In all types: E551

Aluminium, (Al): CAS 7429-90-5-In metalized PET film: E173

7. Use for food packaging in United States (FDA conformance)

This film, (Including Metalized and Coated films) complies with both the Food, Drug and Cosmetic Act of 1958 and all applicable indirect food additive regulations found in 21 CFR § 177.1630. The film are compliant for normal temperature applications (uncoated side of the film) with all type of foods excluding alcoholic beverages and section (h) (1), (2) for oven baking at temperatures above 250°F (121°C), section (g) (1) (2) for packaging, transporting, or holding alcoholic beverages that do not exceed 50% alcohol by volume.

The film compliant and produced in accordance with good manufacturing practices (defined in 21 CFR § 174.5).

8. Recoverability

The film complies with the recoverability requirements set forth in Directive 94/62/EC. The film is not subject to labelling as a hazardous chemical or mixtures according to 1272/2008 (CLP regulation) and its amendments. There is no requirement for classification as hazardous to water according to German regulations (no "WGK"). The formulation of the film does not contain forbidden or restricted substances (perflurooctane sulphonates) as mentioned in Directive 2006/122/EC amendment council directive 76/769/EC and 2003/11/EC. As waste, it does not form materials that require monitoring according to Directives 91/689/EEC and 91/156/EEC.

9. Responsibilities

By following the above mentioned regulations we have fulfilled our duty of care regarding the conformance of the film we supply with legislation governing food contact applications. It is the responsibility of both the manufacturer of the finished food contact articles as well as the food packers to ensure that the finished articles are in actual compliance with the specific and global migration limits for the intended applications.

We accept no liability for losses arising from inadequate suitability of our products after conversions by converters and end users.

Appendix I

Hereby we declare that the following substances are not intentionally used for manufacturing of the films:

SN	Substance	CAS No
1.	Phthalates (Diethylexyl-Phthalate; Diisobutyl-Phthalate; Dibutyl- Phthalate)	117-81-7, 84-69-5, 84-74-2
2.	PCB Polychlorinated biphenyl	1336-36-3
3.	Bisphenol A (BPA)	80-05-7
4.	Recycled PET from consumer sorting	-
5.	Benzophenone	119-69-9
6.	Halogens, Halogen containing polymer additives, Brominated Flame Retardants, Polybrominated biphenyls (PBB), Polybrominated diphenyl ethers (PBDE), Ozone depleting chemicals, Perflourinated alkyl compounds (PFA compounds), perfluorinated compound (PFC) and PFAS (per- and polyfluoroalkyl substances)	-
7.	Penta-BDE Octa-BDE, DEKA-BDE and DEHA (Di-2-Ethylhexyladipat) DINP (Diisononyl Phthalate)	
8.	Semicarbazid	57-56-7
9.	Epoxidised oil of Soya	-
10.	GMO substances	
11.	Mineral oils: <ul style="list-style-type: none"> • MOSH, MOAH – Mineral Oil Saturated Hydrocarbons • PAH – Polycyclic Aromatic Hydrocarbons • POSH – Polyolefin oligomeric Saturated Hydrocarbons • POMH and Arvin-substance 	-
12.	Animal origin products, BSE/TSE	-
13.	Plant origin/derived products, Cellulose	
14.	Natural rubber and/or any dry rubber latex, Azo Pigments	-
15.	Tin organic compounds/ Organostrannic components	-
16.	Primary aromatic Amine	-
17.	Triphenyl Phosphate (TPP)	115-86-6
18.	TNPP	26523-78-4
19.	Asbestos	-

20.	PVC and PVDC	-
21.	Perfluorooctanesulfonic acid (PFOS) , Perfluorooctanoic acid (PFOA)	-
22.	1,4-Dioxane	-
23.	POP (Persistent Organic Pollutants)	-
24.	Palm oil	-

Hereby we declare that the mentioned film does comply with the following regulations:

SN	Regulation	Topic
1.	Reg (EU) No. 1169/2011 (repealing Directive 2000/13/EC and its amendments)	Allergens
2.	2003/53/EC, 76/769/EEC and 2005/84/EC	Council directive related to restrictions of nonylphenol, nonylphenol ethoxylate, phathales and cement
3.	96/5/CE	Directive related to processed cereal-based foods and baby foods for infants and young children
4.	76/768/EEC	Cosmetic legislation
5.	2002/16 EC	"BADGE" (Bisphenol A diglycidyl ether) or related compounds ("BFDGE" and "NOGE")
6.	94/62/EC	Packaging and packaging waste
7.	1223/2009/EC	Cosmetic Regulation Annexes II and III
8.	1999/13/EC	Directive on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations
9.	Arrêté du 27 août 1987	We certify that the Aluminium wire used for the production of metallized film complies with the French regulation "Arrêté du 27 août 1987
10.	Regulation (EC) No 1272/2008 And amendment 944/2013	On classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006
11.	REACH 1907/2006	Annex XV11
12.	Regulation / EC) No 453/2010	(EU) No 453/2010 of 20 May 2010 amending Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
13.	(EC) No 450/2009	On active and intelligent materials and articles intended to come into contact with food
14.	(EC) No 1895/2005	On the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food
15.	SR 817.023.21	Swiss Regulation SR 817.023.21 (2019)
16.	Biocidal Product Use Compliance - 528/2012/EU	
17.	Toxic Substances Control Act of 1976 (15 USC 2601-2692)	-

Cardboard disclaimer:

Roll material: If the product is wound on rolls with cardboard cores, the 5 last windings closest to the core are to be discarded. The outside 2 windings of the rolls are to be discarded as well.

Sheet material: If the product has cardboard supports the 5 sheets closest to the cardboard are to be discarded.

It is the customers responsibility to test and confirm the full suitability of the film for his application.

Date of issue: 11-11-24

Issuer:

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