DECLARATION OF COMPLIANCE

Hereby:
EstPak Plastik AS
Sõnajala 11
92412 Kärdla
Hiiumaa
Estonia

Production plant:
Anti tee 2
76404 Saku vald
Harjumaa
Estonia

Declares, that our **film clear MONO rPET** (recycled polyethylene terephthalate) and all products made of this film **HL250, HL375, HL500, HL750, HL1000, K1320, MT50ABS, P750, RL1901, RC401, RC901, RC491**:

- is incompliance with regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to be in contact with food and under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could: endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof;
- comply with European Commission regulation no 10/2011, as amended before the publication date of this declaration;
- is manufactured in compliance with Good Manufacturing Practice (GMP) as described in Commission Regulation 2023/2006.
- EstPak Plastik AS management system is certified according to food safety standard FSSC 22 000, quality standard ISO 9001:2015 and environmental standard ISO 14 001:2015.

Recycling process

- EstPak Plastik AS production process has got European Food Safety Authority's (EFSA's) approval nr doi: 10.2903/j.efsa.2018.5165 https://www.efsa.europa.eu/en/efsajournal/pub/5165.
- Under the processing conditions described in the expert opinion letter of the EFSA, the recycling process is able to ensure that the level of migration of potential unknown contaminations info food is below a conservatively modelled migration of 0,1 µm/kg food.
- Recycling process and the recycled film meet the specifications for which the EFSA approval has been granted. Post-consumer PET flake originating from drinking bottles is "supercleaned" with Starlinger deCon technology under high vacuum, certain time and temperature, that guarantee materials' safety for direct contact with food. Closed collection system is used for raw material which contains only fully traceable food grade plastic complying to 10/2011/EC and originating from European Union countries.
- Starlinger deCon process has the National Austrian Approval recognized by Mutual Recognition Regulation and is compliant to Commission regulation 282/2008.

SML substances

- Based on the raw materials used, the product contains following substances which according to migration tests or worst-case calculations, do not exceed specific migration limits (SML) under normal or foreseeable conditions of use:

Substance	Identification	Limit	Origin
Polyethyleneglycolmonoalkylether	Ref. No: 77708, CAS No: 63148-62-9	SML 1,8 mg/kg	Silicone coating
Ethylene glycol	Ref.No: 16990/53650, CAS No:107-21-1	SML 30 mg/Kg	Cold impact/ PET
Terephthalic acid	Ref. No: 24910, CAS No: 100-21-0	SML 7.5 mg/kg	Cold impact/ PET
Isophthalic acid	Ref. No: 19150, CAS No: 121-91-5	SML 5 mg/kg	Cold impact / PET
Antimony	CAS No: 7440-36-0	SML 0.04 mg/kg	Cold impact
Pyromellitic anhydride	Ref. No: 24057, Cas No: 089-32-7	SML 0.05 mg/kg	Cold impact
Diethylene glycol	Ref. No: 13326/15760/47680, CAS No: 111-46-6	SML 30 mg/Kg	PET
Antimony trioxide	Ref. No: 35760, Cas No: 1 309-64-4	SML 0,04 mg/Kg	PET

Dual Use Additives

- The product contains following dual-use additives, approved as direct food additives under European Commission regulation 1333/2008 Annex II and III, which have to be considered regarding to actual use of finished article:

Substance	Identification	Origin
Dimethylpolysiloxane	E 900	silicone coating
Phosphoric acid	E 338	PET

Testing

- The overall migration (OML) does not exceed permitted limitations, which is confirmed by accredited National Public Health Surveillance Laboratory test protocol no Ch933/2020, Ch9505/2019 and CH9506/2019, where tested food contact surface area was 1dm^2 and volume 100ml.
- Non-intentionally added substances (NIAS) safety is ensured by non-target gas chromatographic screening by SGS Institut Fresenius GmbH test-report no. 4841558.
- Since the recycled material is originating from collection system, therefore the specific migration testing is risk-based, consulted by SGS Institut Fresenius GmbH at Germany and Eurofins Product Testing Laboratory at Denmark. Information about SML tests, ordered by EstPak Plastik AS, can be obtained under a confidentiality agreement only. Laboratory protocols: Eurofins 07032019, SGS 4841554, SGS 4931411, CH33972020.
- The result of microbiological testing is minimal, Health Board Central Laboratory protocols NHL1900578UHT, NHL1900576UHT.
- The product fulfills the demands of the European Packaging Directive 94/62/ EEC. The sum of the content of lead, cadmium and hexavalent chromium and mercury is less than 100 ppm, National Public Health Surveillance Laboratory test protocol no Ch90962019.

Conditions of use

- dry, aqueous, acidic, dairy and fatty foodstuffs

01	Beverages
02	Cereals, cereal products, pastry, biscuits, cakes and other bakers' ware
03	Chocolate, sugar and products thereof Confectionery products
04	Fruit, vegetables and products thereof
05	Fats and oils
06	Animal products and eggs
07	Milk products
08	Miscellaneous products

Food category specific assignment of food simulants, Annex III, Table 2, 10/2011/EU

- Application temperature: heating up to 70°C for up to 2 hours, which is followed by long term storage at room temperature or below, lowest - 40 °C. At temperatures + 70...100°C the mechanical properties of the final product must be assessed.
- Not allowed in microwave oven.
- Intended for single use packaging.
- Minimal filling requirements do not apply if containers are used as intended.

Storing and handling

- Suggested storage conditions in warehouse: products generally have to be stored in a dry warehouse wrapped into protective film; dusty free environment; protected from UV radiance up to 5 year.

Disclaimer

- The information provided in this document has been carefully compiled, according to the producer's best knowledge.
- Please note that according to the above-mentioned regulations the business operator who is placing final food contact article on the market is responsible for the suitability check for the final food contact use.

Confidentiality

- The information provided for the SML substances, dual-use additives and testing is considered confidential and is only to be used to evaluate the above mentioned product intended for food packaging applications and specifically the additives which are subject to a Specific Migration Limit in food contact regulations and/or the additives which are listed with restriction in the food regulations.

09.11.2020

Marek Harjak
General Manager
EstPak Plastik AS
This letter was compiled electronically, it is therefore valid without signature