

Denmark, 05.01.2022

## Declaration of compliance

Confidential

*This "Declaration of compliance" is the sole property of Ulfoss Plastic A/S and is only intended to supply information to the customer of Ulfoss Plastic A/S. Therefore, this document must not be fully or partly handed over to any third party or made public.*

**Quality: Polyethylene freezerbags; FIXA 2, 4, 8, 11 and 19 liter and  
First Price 4 and 8 liter, Dagrofa**

### Compliance with food contact legislation

In manufacturing this product, we comply with the requirements on good manufacturing practices as laid down in Regulation (EC) No 2023/2006. Furthermore, the raw materials of our product are declared suitable for food contact use. Consequently, the product is considered to comply with the general safety requirements of Regulation (EC) No 1935/2004. We also comply with the provisions on labelling (Art.15), declaration of compliance (Art.16) and traceability (Art.17) as provided in Regulation (EC) No 1935/2004.

### Overall Migration Limit

As laid down in Regulation (EC) No 10/2011, and its amendments; 321/2011, 1282/2011, 1183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/213, 2019/37, 2019/1338 and 2020/1245, plastic materials in contact with foodstuff are subjected to an Overall Migration Limit (OML) of 10 mg/dm<sup>2</sup> (Art.12). Test conditions and simulants are specified in Annex V of Regulation 10/2011.

The overall migration of relevant samples is tested, according to test procedure EN 1186, with food simulant A (10% ethanol), B (3% acetic acid) and D2 (olive oil) at 40°C in 10 days.

The ratio, of the food contact surface area to volume used to establish the compliance of the packaging film, is 6 dm<sup>2</sup>/kg.

The test results of the overall migration at 40°C in 10 days are all well below the threshold value of 10 mg/dm<sup>2</sup>.

This proves the suitability, according to Annex V of Regulation 10/2011, of this product for contact with all types of food (watery-, acid-, alcoholic- and fatty foods) and for indefinite storage time at refrigerated and frozen conditions and at room temperature, including heating up to 70°C for up to 2 hours, or heating up to approx. 100°C for up to 15 minutes.

### Specific restrictions on substances in plastics

This product contains the listed substances and additives (Table 1) which are regulated with a specific migration limit by EU Regulation 10/2011.

<b>Name</b>	<b>CAS No</b>	<b>PIM</b>	<b>Restriction SML</b>
1-octene	0000111-66-0	22660	15 mg/kg
Octadecyl-3-(3,5-ditertbutyl-4-hydroxyphenyl) propionate	0002082-79-3	68320	6 mg/kg

Table 1

Tests made by the supplier show that migration limits are not exceeded. Calculation based on "Worst case scenario", state that specific migration limits (SML) for the non-fatty food simulants 3% acetic acid and 10% ethanol and for the fatty food stimulant olive oil, are not exceeded in < 0.200 mm thick film.

The above list of restricted substances with a specific migration limit is complete to the extent that accurate information is received from our raw material suppliers.

### Dual Use Additives

In accordance with Regulation 10/2011 the following list (Table 2) identify additives ("dual-use" substances), which are authorised as food additives and flavourings. None of the substances migrate into foodstuff in quantities exceeding the restriction in Regulation 1333/2008/EEC and 1334/2008/EEC.

<b>Food additive</b>	<b>Name</b>	<b>CAS No</b>	<b>PIM</b>
E551	Silicium Dioxide	0007631-86-9	86240
E553B	Talc	0014807-96-6	92080

Table 2

### Compliance verification

It is the manufacturer of the finished food contact packaging film product that is imposed responsibility, according to Regulation 10/2011, to make sure that the finished product complies with the OML and when necessary with SML. Verification of compliance with the migration limits shall be carried out in accordance with the rules laid down in Regulation 10/2011. It is also necessary the testing of the mutual compatibility between the finished products and the food substances, in particular the non-modification of their organoleptic properties

### Metals

We hereby confirm that the contents of Lead, Cadmium, Mercury and Hexavalent Chromium in the product do not exceed the value of 100 ppm, which is valid according to the Packaging and Waste Directive 94/62/EEC. The product does not contain substances labelled as eco-toxic (danger symbol 'N'). This statement is based on information from our raw material suppliers.

### BADGE, BFDGE or NOGE

We hereby confirm that there are no presences of bisphenol A (BPA), bisphenol A diglycidyl ether (BADGE), bisphenol F diglycidyl ether (BFDGE and novolac glycidyl ether (NOGE)) in our materials, which are of concern in Commission Regulation (EC) No. 1895/2005.

### Phthalates

We hereby confirm that there is no presence of phthalate esters in our products.

REACH and SCIP

We hereby confirm that our products meet the REACH chemicals regulation requirements. As a Downstream user, we have statements from our suppliers that required substances have been pre-registered in due time and registered in the ECHA SCIP database. Statements from our suppliers announce that the amount of SVHC, according to the candidate list, if any, does not exceed 0.1%.



Ulla Matthiesen  
Quality Coordinator