

Declaration of Compliance

1. Product Manufacturer - Plastchim-T AD

Seat:

Bulgaria, Tervel 9450, 97 Khan Asparuh Str

Production of BOPP:

Bulgaria, 9154 Aksakovo, 21 Dobrudza Str;

Bulgaria, 9160, Devnya, Industrial Zone South

Office: +359 (0) 52 765 860, +359 (0) 52 765 811, Fax: +359 (0) 52 699 985

Producer of BOPP films for food packaging types: FXC, FXCAF, FXCB, FXS, FXCL, FXCLS, FXCM, FXCMB, FXCHM, FXPM, FXPMB, FXCFM, FXCFMB, FXCHFM, FXPFM, FXCPFMB, FXCMT, FXP, FXA, FXPA, FXPF, FXPFB, FXPU, FXPL, FXPLA, FXPLF, FXCW, FXCWLS, FXCP, FXCWP, FXCWPLS, FXWPUS, FXPWP, FXWD, FXWL.

2. Used materials for production of BOPP films:

- PP homopolymer (types mostly used: Moplen HP 525J; Moplen HP 526J; Ecolen HF 14K; Repol H 034SG; Tatren HF 3 22; APC PP 1104K; Sabic PP521 P)
 - PP terpolymer (types mostly used: Adsyl 5C37F; Adsyl 5C37F ST; Eltex P KS 350; Eltex P KS 357)
 - Additives for regulation of Coefficient of Friction, electrostatic characteristics, optical properties etc. (types mostly used: : Constab SAT 04509; Schulman FASPS 2950 W; Schulman PF 97 NTS; Ampacet COEXAS 33; White CC 18160 PP; Ampacet White 96)
- All used materials are suitable for food contact and there is no presence of functional barrier.

3. This declaration is issued on 06. 07. 2020

We declare and confirm that all types of BOPP films, produced by Plastchim-T AD meet the requirements listed in:

Regulations №2019/1338, №2019/37, №2018/831, №2018/213; № 2018/79, № 2017/752, №2016/1416, №2015/174, №202/2014, №1183/2012, №1282/2011 and №321/2011 amending Regulation 10/2011/EC, having regard to Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC(1);

Commission Regulation (EC) No. 450/2009 of 29 May 2009 on active and intelligent materials and articles intended to come into contact with food;

Commission regulation № 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food amended by Regulation № 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods and Commission Regulation (EC) No. 2015/1906 of 22 October 2015 on recycled plastic materials and articles intended to come into contact with foods;

Plastics Directive 2002/72/EC and its later amendments 2004/1/EC, 2004/19/EC, 2005/79/EC, 2007/19/EC, 2008/39/EC, 975/2009/EC, 2010/169/EC and/or the Synoptic Document, **with the following Italian Regulations:**

D.M. 21/03/1973 and following revisions and amendments,

DPR 777/82 and following revisions and amendments, UNI 13430/2005

Canadian Food and Drug Regulations

Division 23 – Food Packaging Materials

Switzerland: BGVO 817.023.21 of 23rd November 2005, and revised version of the Ordinance on Materials and Articles in contact with food (817.023.21), which came into force on 1st May 2017

California Proposition 65

Based on certification from our resin and additive suppliers, we certify that all BOPP films do not contain any cancer causing or reproductive toxicity chemicals. We certify that during the production of our films, we do not use or intentionally add into them any of the substances as restricted on the California Proposition 65 List of Chemicals and its subsequent amendments pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (also known as California Proposition 65)

US Food and Drug Administration (FDA)

We declare that our films meet the FDA requirements contained in the Code of Federal Regulations in 21 CFR 177.1520 for Olefin polymers. We confirm that the production of our BOPP films that we supply to the customers are made only from the materials sanctioned by FDA. All components comply with the US Food, Drug and Cosmetic Act of 1958 and applicable indirect food additive regulations of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under title 21 with sections as:

- 174.5
- 178.3130
- 178.3860
- 178.2010
- 182.1711
- 184.1033
- 184.1324
- According to the information received from our suppliers the base resins in this products meet the FDA requirements in 21 CFR 177.1520 (a) (1)(i) and (c)1.1a.
- According to the information received from our suppliers this product may contain adjuvant substances that may be safely used in polymers used for the manufacture of articles that come into direct contact with food. According to information, these substances used in this product meet the requirements of their respective FDA regulations, FCNs, and 21 CFR 177.1520(b).
- This products meet the FDA criteria in 21 CFR 177.1520 for food contact applications, including cooking, listed under conditions of use A through H in 21 CFR 176.170(c), Table 2, and can be used in contact with all food types as listed in 21 CFR 176.170(c), Table 1

It is the responsibility of the converter or food packer to control that the final packaging complies with the requirements of the intended and foreseeable conditions of use.

PR China

According to the information received from our suppliers the additives and PP Homopolymers and terpolymers, used for the production of our BOPP films do not contain any substances which are regulated with a restriction in their use. All intentionally added substances contain only substances that are subject to PRC National regulating standards and are listed on this standards as follow:

GB 4806.1-2016 General safety requirements for food contact material and articles; GB9685-2016 Standard for uses of additives in food contact materials and articles; GB 4806.7-2016 National Food Safety Standard for Plastic Materials and Articles in Contact with Foodstuffs; GB 4806.6-2016 National Food Safety Standard for Resins Used to Make Plastics in Contact with Foodstuffs - Appendix A - 74 Polypropylene homopolymer

GMP

In accordance with Regulation 2023/2006/EC as amended by Commission Regulation (EC) No. 282/2008 of 27 March 2008 and Commission Regulation (EC) No. 2015/1906 of 22 October 2015 Plastchim-T AD declares that the company is in compliance with general rules on good manufacturing practice (GMP).

Conflict minerals (Dodd-Frank Wall Street Reform and Consumer Protection Act - September, 2010)

Allergen Statements

The food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of these products. However, this product has not been tested for these substances.

Toy safety directive 2009/48/EC and its later amendments 2012/7/EC, 2014/79/EC, 2014/81/EC, 2014/84/EC

Restriction of Hazardous Substances in Electric and Electronic Equipment (RoHS)

RoHS Regulation refers to electrical and electronic equipment and not specifically to plastic materials. However, based on the available documentation from raw materials suppliers, this product complies with the requirements of the Directives 2002/95/EC and 2011/65/EU, as amended, concerning the limits of cadmium, lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl)phthalate (DEHP), butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP).

4. During the production of BOPP films we do not intentionally add substances, that exceed SM limits according Regulation № 10/2011/EC (Annex I, Annex II Substances);

4.1. During the production we use additives that are in conformity (regarding producer documents) to this Framework Regulation (1935/2004/EC) and Regulation 10/2011/EC with amendments. Also we declare that according our calculations (assuming that 1 kg. of food is packaged with 6 dm² of film) we do not exceed SM limits of the substances with the following restrictions for none of the film types we produce for any of the thicknesses produced.

Table 1

FCM substance №	Ref.№	CAS №	Substance name	Use as additive or polymer production aid (yes/no)	Use as monomer or other starting substance or macromolecule obtained from microbial fermentation (yes/no)	FRF applicable (yes/no)	SML (mg/kg food)	SML(T) (mg/kg food) group restriction №	Max. SM (mg/kg food) (calculated)
661	95360	0027676-62-6	1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	yes	No	yes	5		< 0.265
760	83595	0119345-01-6	reaction product of di-tert-butylphosphonite with biphenyl, obtained by condensation of 2,4-di-tert-butylphenol with Friedel Craft reaction product of phosphorous trichloride and biphenyl	yes	no	no	18		< 0.265
433	68320	0002082-79-3	octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	yes	no	yes	6		< 0.265
19	39090*	-	N,N-bis(2-hydroxyethyl)alkyl (C8-C18)amine	yes	no	no		(7)	<1.06

* – Not contained in metallized films and films intended for metallization

According to the information received from our suppliers the additives and PP Homopolymers and terpolymers, used for the production of said films do not contain any genetically modified organisms (GMO), palm oil, substances derived from rice, NANO materials, Carcinogen, Mutagenic or Toxic to the reproduction materials. Plastchim-T AD can state also that we do not intentionally use or add genetically modified organisms (GMO), palm oil, substances derived from rice, NANO materials, Carcinogen, Mutagenic or Toxic to the reproduction materials.

4.2. According to the information received from our suppliers of additives, PP Homopolymers and terpolymers Plastchim-T AD can state that according Regulation № 453/2010/EC amending 1907/2006/EC (REACH) we do not intentionally use or add phthalates (DEHP, DBP, BBP, DIBP, DIDP, DINP, DMP, DnHP, DnOP, DEP, DMEP) as polymer additives when we produce these films.

4.3. According to the information received from our suppliers none of the following substances are used in our production process nor are they expected to be part of the raw materials to manufacture this product:

- ✓ 5-tert-butyl-2,4,6-trinitro-m-xylene
 - ✓ 4,4'- Diaminodiphenylmethane (MDA)
 - ✓ 2-phenyl-3,3-bis(4-hydroxyphenyl)phthalimidine
 - ✓ 2,4-Dinitrotoluene
 - ✓ 2-chloroacetamide
 - ✓ 2-ethylhexyl 10-ethyl-4, 4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE)
 - ✓ 4-(1,1,3,3-tetramethylbutyl) phenol
 - ✓ Reaction mass of DOTE and MOTE
 - ✓ 2,4-Pentanedione
 - ✓ 1,3-bis(isocyanatomethyl)benzene
 - ✓ Adipates
 - ✓ Aromatic amines
 - ✓ Arsenic
 - ✓ Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)
 - ✓ Acrylamide
 - ✓ Alkylphenol Ethoxylates, including nonylphenol ethoxylate and octylphenol ethoxylate
 - ✓ Allergens, such as peanuts, tree nuts, milk, eggs, wheat gluten, soy, fish, and shellfish
 - ✓ Aluminosilicate Refractory Ceramic Fibres are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfill the two following conditions:
 - a) Al₂O₃ and SiO₂ are present within the following concentration ranges:
 - Al₂O₃: 43.5 – 47 % w/w, and SiO₂: 49.5 – 53.5 % w/w, or
 - Al₂O₃: 45.5 – 50.5 % w/w, and SiO₂: 48.5 – 54 % w/w,
 - b) fibres have a length weighted geometric meaning a diameter less two standard geometric errors of 6 or less micrometres (µm). - Extracted from Index no.: 650-017-00-8 - 13.01.2010
- Carcinogenic (article 57a) (support doc.) ED/68/2009
- ✓ Ammonium dichromate
 - ✓ Anthracene
 - ✓ Anthracene oil, anthracene paste
 - ✓ Antraquinone (9,10-Anthracenedione)
 - ✓ Antimony tris (ethylene glycolate)
 - ✓ Asbestos
 - ✓ Azo compounds
 - ✓ Benzophenone(n) and derivatives
 - ✓ Michler's ketone (4,4-bis(dimethylamino)benzophenone)
 - ✓ DEAB (4,4-bis(diethylamino)benzophenone)
 - ✓ Benzo chrysene
 - ✓ 4-methylbenzophenone
 - ✓ 4-hydroxybenzophenone
 - ✓ ITX, TXIB
 - ✓ Benzyl butyl (BBP)
 - ✓ Beryllium oxide
 - ✓ Beryllium copper
 - ✓ Benzenamine (BNST)
 - ✓ 2-benzotriazol-2-yl-4,6-di-tert-butylphenol (UV-320)
 - ✓ 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)
 - ✓ Bis(tributyltin)oxide (TBTO)
 - ✓ Bisphenols including:

- 2,2-Bis(4-hydroxyphenyl)propane - (bisphenol A) ;
- 2,2-dimethoxy-2-phenylacetophenone
- 1,1-Bis(4-hydroxyphenyl)-1-phenyl-ethane - (bisphenol AP) ;
- 2,2-Bis(4-hydroxyphenyl)hexafluoropropane -(bisphenol AF) ;
- 2,2-Bis(4-hydroxyphenyl)butane - (bisphenol B) ;
- Bis-(4-hydroxyphenyl)diphenylmethane - (bisphenol BP) ;
- 2,2-Bis(3-methyl-4-hydroxyphenyl)propane - (bisphenol C) ;
- Bis(4-hydroxyphenyl)-2,2-dichlorethylene - (bisphenol C) ;
- bis(2-methoxyethyl) ether
- 1,1-Bis(4-hydroxyphenyl)ethane - (bisphenol E) ;
- Bis(4-hydroxydiphenyl)methane - (bisphenol F) ;
- 2,2-Bis(4-hydroxy-3-isopropyl-phenyl)propane - (bisphenol G) ;
- 1,3-Bis(2-(4-hydroxyphenyl)-2-propyl)benzene - (bisphenol M) ;
- Bis(4-hydroxyphenyl)sulfone - (bisphenol S) ;
- 1,4-Bis(2-(4-hydroxyphenyl)-2-propyl)benzene- (bisphenol P) ;
- 5,5'-(1-Methylethyliden)-bis[1,1'-(bisphenyl)-2-ol]propane - (bisphenol PH) ;
- 1,1-Bis(4-hydroxyphenyl)-3,3,5-trimethyl-cyclohexane - (bisphenol TMC) ;
- 1,1-Bis(4-hydroxyphenyl)-cyclohexane - (bisphenol Z) ;
- Bis 204-2(2-ethylhexy) phthalate (DEHP) ;
- ✓ Boric acid
- ✓ Borax
- ✓ Butylated Hydroxytoluene (BHT) and Butylated Hydroxyanisole (BHA)
- ✓ Bovine Spongiform Encephalopathy (BSE)
- ✓ Carbon black and carbon pigments
- ✓ Casein
- ✓ Cobalt dichloride
- ✓ Cadmium
- ✓ Chlorinated aliphatic compounds
- ✓ Chlorine bleach
- ✓ Dioxins
- ✓ Diarsenic trioxide
- ✓ Diarsenic pentaoxide
- ✓ Disodium tetraborate, anhydrous
- ✓ Dibutyl phthalate (DBP)
- ✓ Diethyl phthalate (DEP)
- ✓ Di-(2-ethylhexyl) phthalate
- ✓ Di-n-hexyl phthalate (DnHP)
- ✓ Di-n-octyl phthalate (DnOP)
- ✓ Dibutyltin (DBT)
- ✓ Dioctyltin (DOT)
- ✓ Dipropylene Glycol Dibenzoate (DPGDB)
- ✓ Dymethyl fumarate (DMF)
- ✓ Ethylene glycol dimethyl ether (EGDME)
- ✓ Epoxy derivatives listed in EU Directive 2002/16/EC
- ✓ Halogens (Fluorine , Chlorine , Bromine , Iodine) and derivatives
- ✓ Hexane (n-hexane, isohexane, neohexane, cyclohexane)
- ✓ Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified
Alpha-hexabromocyclododecane,

- Beta-hexabromocyclododecane,
- Gamma-hexabromocyclododecane
- ✓ Hazardous Air Pollutants (HAP)
- ✓ Hydrofluorocarbon (HFC), Hydrochlorofluorocarbons (HCFC), Perfluorocarbon (PFC)
- ✓ Sulfur hexafluoride (SF)
- ✓ Lactic acid
- ✓ Lead
- ✓ Lead chromate
- ✓ Lead chromate molybdate sulphate red (C.I. Pigment Red 104)
- ✓ Lead sulfochromate yellow (C.I. Pigment Yellow 34)
- ✓ Lead hydrogen arsenate
- ✓ Formaldehyde
- ✓ Furfural
- ✓ Melamine (1,3,5-Triazine-2,4,6-triamine) and Cyanuric acid (1,3,5-Triazine-2,4,6-triol)
- ✓ Methyl bromide
- ✓ N-Ethyl-o(or p)-toluenesulfonamide
- ✓ Natural rubber latex and dry natural rubber
- ✓ Nitrates and Nitrites
- ✓ Nitrosamine
- ✓ Nonyl phenol
- ✓ Nonyl- and octylphenoles
- ✓ N,N-dimethylacetamide (DMAC)
- ✓ N-Methyl-2-pyrrolidone (NMP)
- ✓ Ozone-depleting substances (ODS)
- ✓ Organic Tins
- ✓ Organo-Tin Compounds
- ✓ Organophosphorus compounds
- ✓ Organic Fluorinated substances
- ✓ Oxo-degradable additives
- ✓ PAN (Polyacrylonitrile)
- ✓ Parabens
- ✓ Perchlorates
- ✓ PET (Polyethylene terephthalate)
- ✓ Pesticides, biocides, herbicides, fungicides, preservatives
- ✓ Pitch, coal tar, high temp.
- ✓ Phenol
- ✓ 2-Phenylphenol, 3-Phenylphenol, 4-Phenylphenol
- ✓ Photoinitiators
- ✓ Polyacrylonitrile (PAN) – Acrylonitrile (107-13-1) monomer, Polyacrylonitril
- ✓ Polychlorinated and Polybrominated Biphenyls (PCBs and PBBs)
- ✓ Polychlorinated and Polybrominated Terphenyls (PCTs and PBTs)
- ✓ Polychlorinated naphthalenes (PCN)
- ✓ Polybrominated Diphenyl Ethers (PBDEs)
- ✓ Polycyclic aromatic hydrocarbons (PAHs)
- ✓ Polyamides
- ✓ Polystyrene (PS)
- ✓ Per- and polyfluoroalkyl substances (PFAS) such as perfluorooctanoic acid (PFOA), perfluorooctane sulfonates (PFOS), (PFHxS), (PFNA), (PFDA), (PFCs) and others.
- ✓ Peroxides and Organic peroxides
- ✓ Polyaromatic Hydrocarbons

- ✓ Potassium chromate
- ✓ Potassium dichromate
- ✓ Quaternary ammonium compounds (including DDAC and BAC)
- ✓ Radioactive Substances
- ✓ Rosin
- ✓ Siloxanes
- ✓ Sodium chromate
- ✓ Sodium antimonite
- ✓ Styrene
- ✓ Sodium dichromate
- ✓ Short-chain chlorinated paraffins(SCCP)
- ✓ Specific azo compounds
- ✓ Sulphur and organosulphur compounds
- ✓ Tetraboron disodium heptaoxide, hydrate
- ✓ Tetrabrombisphenol A (TBBPA)
- ✓ Toluene
- ✓ Triclosan
- ✓ Trichloroethylene
- ✓ Triethyl arsenate
- ✓ Triphenyltin (TPT)
- ✓ Tris-Nonylphenol Phosphite
- ✓ Tris(2-chloroethyl)phosphate
- ✓ Trixylyl phosphate (TXP)
- ✓ Transmissible Spongiform Encephalopathy (TSE)
- ✓ Urea-formaldehyde resins or polymers
- ✓ Vinyl Chloride Monomer (VCM), Polyvinyl Chloride (PVC), Polyvinylidenechlorid (PVdC)
- ✓ Volatile Organic Compounds (VOC)
- ✓ Zirconia Aluminosilicate Refractory Ceramic Fibres

are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the two following conditions:

a) Al₂O₃, SiO₂ and ZrO₂ are present within the following concentration ranges:

- Al₂O₃: 35 – 36 % w/w, and
- SiO₂: 47.5 – 50 % w/w, and
- ZrO₂: 15 - 17 % w/w,

- ✓ b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (µm).
- ✓ POSH (polyolefin oligomeric saturated hydrocarbons)
- ✓ MOSH (Mineral Oil Saturated Hydrocarbon), MOAH (Mineral Oil Aromatic Hydrocarbon)
- ✓ Isopropylthioxanthone (ITX)
- ✓ Titan-Acetylacetone (TAA)
- ✓ Fluoro-Surfactants, reference substance PFOS
- ✓ PFOA
- ✓ Azodicarbonamide
- ✓ Ethylhexanoic acid
- ✓ PAA (Primary Aromatic Amins)
- ✓ Soy Bean oil epoxide (ESBO)
- ✓ Pigments based on Antimony, Arsenic, Cadmium, Chrome IV, Plumb,
- ✓ Quicksilver
- ✓ Chlorobenzene, Dichlorobenzene
- ✓ Nitropropane

- ✓ CHC (Chlorinated hydrocarbons),
- ✓ CFC (chlorofluoro-carbons)
- ✓ Chlorinated paraffines and PAHs
- ✓ Hexachlorocyclohexane
- ✓ Di-Amino-Stilbene
- ✓ Nitrosamine
- ✓ Perbromated flame retardants
- ✓ Benzol (Benzene), Furan
- ✓ Pentachlorophenol (PCP)
- ✓ Polychlorinated Bi-and Terphenyles (PCB, PCT)
- ✓ Polychlorinated dibenzodioxins (PCDDs) and- furanes (PCDF)

4.4. Dual-use additives:

Some of our products may contain one or more food additives as defined in Regulation 10/2011/EC such as:

Table 2

FCM substance №	Ref №	CAS №	Substance name	SML	Max. content (calculated)
-	-	-	Calcium salts of fatty acids	-	0.04%
504	86240	7631-86-9	Synthetic Silica (E551)	-	0.005%
610	93440	13463-67-7	TiO ₂ (used only for white films) E171	-	7%

We declare also that none of the ingredients used during the production of the aforementioned films contain substances that exceed the limits of [Regulation 10/2011/EC](#).

For more detailed information please contact with sales department representative.

No heavy metals (i.e., antimony, arsenic, barium, cadmium, chromium, Hexavalent chromium, lead, mercury, selenium, or silver) are purposely added to these products in quantities that could violate any governmental guidelines.

- BADGE – (2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl)) regarding 1895/2005 EC,
- BFDGE – (bis(hydroxyphenyl)methane bis(2,3- epoxypropyl)) regarding 1895/2005 EC,
- NOGE – (novolac dlycidyl) regarding 1895/2005 EC,
- o-xylene (xylol),
- Deca Brominated Diphenyl Ethers (Deca BDE)

are not intentionally added to these products.

4.5. Plastchim-T AD does not need to register or pre-register its own films. Under the EC Regulation REACH these products are classified as a preparation. Our suppliers confirm that all substances of this preparation are compliant to the pre-registration requirements of REACH, and they will have the intentions to proceed with the registration of these substances, or to procure substances only from suppliers from which confirmation has been received that the suppliers are aware of their REACH requirements, that they have pre-registered and/or will timely register their substances, and that they will supply the relevant Safety Data Sheets (SDS) with REACH registration numbers as soon as the registrations occur.

We declare that

- We don't intentionally use or add substances mentioned in Annex XIV and Annex XVII of Regulation (EC) No 1907/2006 (REACH), including last amendments – Commission Regulation (EU) 2018/35 of 10.01.2018.
- We don't intentionally use or add substances of very high concern (SVHC) published on the latest version of [REACH Candidate list](#) from 25.06.2020.

4.6. These products therefore meet the relevant requirements of the following Directives and Regulations:

Directive 94/62/EC – Packaging and Packaging Waste Directive, amended by Regulation (EC) №1882/2003, Directive № 2004/12/EC, Directive № 2005/20/EC, Regulation (EC) №219/2009, Directive № 2013/2 EU, Directive (EU) № 2015/720, Directive (EU) № 2018/852 for heavy metals present in the packaging and their release into the environment; dangerous substances present in the packaging and their release into the environment.

Regarding Directive 89/107/EC Annex 1 we don't use following food additives:

- Colour
- Preservative
- Anti-oxidant
- Emulsifier
- Emulsifying salt
- Thickener
- Gelling agent
- Stabilizer (1)
- Flavour enhancer
- Acid
- Acidity regulator (2)
- Anti-caking agent
- Modified starch
- Sweetener
- Raising agent
- Anti-foaming agent
- Glazing agent (3)
- Flour treatment agent
- Firming agent
- Humectant
- Sequestrant (4)
- Enzyme (4) (5)
- Bulking agent
- Propellant gas and Packaging gas

Regarding Directive 88/388/EEC, Repealed by Regulation (EC) No 1334/2008 of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods and amending Council Regulation (EEC) No 1601/91, Regulations (EC) No 2232/96 and (EC) No 110/2008 and Directive 2000/13/EC – we don't use any "flavourings" in our products.

Stockholm Convention – Regarding Regulation (EC) No850/2004 of 29 April 2004 on persistent organic pollutant and amending Directive 79/117/EEC, repealed by Regulation (EU) 2019/1021 of 20 June 2019 on persistent organic pollutants we don't use any substances listed in Annexes I, II, III and IV.

Regarding Regulation (EU) No 528/2012 of 22 May 2012 concerning the making available on the market and use of biocidal products we don't use any biocidal products in our films.

5. We confirm that the plastic materials or articles, products from intermediate stages of manufacture or the substances meet relevant requirements laid down in this [Regulation 10/2011/EC](#) and Regulation (EC) No 1935/2004 and Plastchim-t AD has an appropriate system which allows the full traceability of the rolls to the raw material.

6. Specifications on the use of the BOPP:

- BOPP films can be in contact with all types of food;
- BOPP films are tested for contact with all types of food regarding Methods described in Annex III in [Regulation 10/2011/EC](#) (Table 1, List of food simulants). Testing for 10 days at 60 °C shall cover long term storage above 6 months at room temperature and below including hot-fill and/or heating up to 70 °C for up to 2 hours, and/or heating up to 100 °C for up to 15 minutes.
- It is not recommended to use the BOPP films in temperatures higher than 70⁰C for more than two hours or up to 100⁰C for more than 15 minutes.
There is no any limitation for the duration of the contact with food at room temperature and below;
- [Regulation 10/2011/EC](#) has not issued any specific regulation on food packaging for microwave use. If the film is in contact with fatty based foods it is possible to have overheating temperatures which can be above the melting point of the polypropylene film and cause non-compliance through breakdown. We recommend using BOPP films with temperatures below 110⁰C;
- BOPP film is made of materials, which can not be filled in and for which it is practically impossible to establish the ratio of food contact surface area to the quantity of the food, which is in contact.

7. NIAS risk assessment

Below is presented adequate information related to the substances that are a subject to restriction in food, obtained by experimental data with migration tests, carried out according to [Regulation 10/2011/EC](#) (simulants A, B, D2 (substitute 95% ethanol) and E at the condition of 10 days at 60°C or 10 days at 40°C.

Detailed information can be provided upon customer's request.

Table 3

№	Overall migration of low molecular substances	Units	Measured value	OML	Test conditions
1.	Migration of low molecular substances	mg/dm ²	< 1.5	10	10 days 60 °C with 10% ethanol
2.	Migration of low molecular substances	mg/dm ²	< 1.5	10	10 days 60 °C with 3% acetic acid
3.	Migration of low molecular substances	mg/dm ²	< 1.5	10	10 days 60 °C with vegetable oil (95% ethanol)
4.	Migration of low molecular substances	mg/dm ²	< 1.5	10	10 days 40 °C with MPPO

№	Specific migration – Name of the index	Units	Measured value	SML	Test conditions
1.	Specific migration - formaldehyde	mg/kg	< 0.005	15	10 days 60 °C with 10% ethanol
2.	Specific migration - formaldehyde	mg/kg	< 0.009	15	10 days 60 °C with 3% acetic acid
3.	Specific migration - formaldehyde	mg/kg	< 0.16	15	10 days 60 °C with vegetable oil (95% ethanol)
4.	Specific migration – primary aromatic amines	mg/kg	< 0.01	< 0.01	10 days 60 °C with 10% ethanol
5.	Specific migration – primary aromatic amines	mg/kg	< 0.01	< 0.01	10 days 60 °C with 3% acetic acid
6.	Specific migration – primary aromatic amines	mg/kg	< 0.01	< 0.01	10 days 60 °C with 95% ethanol
7.	Specific migration - metals	mg/kg	Ba <0.003 Co < 0.0005 Cu – 0.01	Ba - 1 Co – 0.05 Cu – 5	10 days 60 °C with 10% ethanol

			Fe – 0.022 Li < 0.001 Mn < 0.003 Zn < 0.005 Al < 0.005 Ni – 0.002	Fe - 48 Li – 0.6 Mn – 0.6 Zn – 5 Al – 1.0 Ni – 0.02	
8.	Specific migration - metals	mg/kg	Ba <0.003 Co <0.0005 Cu – 0.01 Fe – 0.022 Li < 0.001 Mn < 0.003 Zn < 0.005 Al <0.005 Ni – 0.002	Ba - 1 Co – 0.05 Cu – 5 Fe - 48 Li – 0.6 Mn – 0.6 Zn – 5 Al – 1.0 Ni – 0.02	10 days 60 °C with 3% acetic acid
9.	Specific migration - metals	mg/kg	Ba <0.003 Co <0.0005 Cu – 0.01 Fe – 0.022 Li < 0.001 Mn < 0.003 Zn < 0.005 Al < 0.005 Ni – 0.002	Ba - 1 Co – 0.05 Cu – 5 Fe - 48 Li – 0.6 Mn – 0.6 Zn – 5 Al – 1.0 Ni – 0.02	10 days 60 °C with vegetable oil (95% ethanol)
10.	Specific migration - formaldehyde	mg/kg	< 1.5	15	10 days 40 °C with MPPO
11.	Specific migration - metals	mg/kg	Ba < 0.1 Co < 0.01 Cu < 0.015 Fe < 0.05 Li < 0.008 Mn < 0.015 Zn < 0.015	Ba - 1 Co – 0.05 Cu – 5 Fe - 48 Li – 0.6 Mn – 0.6 Zn – 5	10 days 40 °C with MPPO
12.	Specific migration - 4-metyl-1-penten	mg/kg	<0.005	0,05	10 days 40 °C with MPPO
13.	Specific migration - 1- octene	mg/kg	<0.9	15	10 days 40 °C with MPPO
14.	Specific migration - primary aromatic amines	mg/kg	<0.01	<0.01	10 days 40 °C with MPPO

8. Kosher certified - Plastchim-T AD is a plastic film manufacturing facility that has no type of foods or food type materials involved within the processes or operations. To be Certified by a Rabbi of the Jewish Faith is not considered applicable for this type of facility

9. Halal statement - We can say that among the large variety of polymer additives that we are using in our BOPP films, only a few of them may be formulated with substances of animal origin. Our suppliers claim that the processing of such animal derived substances is made under rigorous conditions, considered unlikely to be infectious irrespective of geographical origin and the nature of the tissues from which they are derived. Our suppliers also claimed that the raw materials that they use and the finished products they sell comply with the existing legislations. Concerning the absence of wine, ethyl alcohol or spirits in all BOPP films, we can say that they are not formulated with this substance, which means that we do not intentionally use it as raw material. Therefore, we do not expect its presence. This concerns only the composition of BOPP films produced by us and does not guarantee the compliance of final articles made by using our BOPP films.

10. Recyclability

All types of BOPP films of PLASTCHIM-T AD are recyclable as per industry standards and procedures



CEN Standard EN 13432:2004 - this product is not suitable for composting.

Energy Recovery - CEN Standard EN 13431:2004 – the calorific gain from polypropylene in an energy recovery process is 24 MJ/kg.

11. If any significant changes that can cause changes in the migration are made in the production process, this declaration will be changed accordingly. We declare also that during processing of the goods nothing will be changed without announcement to the customer.

This document is valid from the date of issue until 31.12.2020

Last updated on 06. 07. 2020

Disclaimer:

This declaration has been prepared and issued on the basis of information provided by our raw material suppliers, of currently applicable laws and regulations, and to the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. PLASTCHIM-T AD makes no warranties which extend beyond the description contained herein. Nothing herein shall constitute any warranty of merchantability or fitness for a particular purpose. It is the customer's responsibility to inspect and test our products in order to satisfy itself as to the suitability of the products for the customer's particular purpose. The customer is responsible for the appropriate, safe and legal use, processing and handling of our products.

No liability can be accepted in respect of the use of PLASTCHIM-T AD products in conjunction with other materials. The information contained herein relates exclusively to our products when not used in conjunction with any third party materials.