



Declaration of Compliance for RPET Food Packaging Material – Rev 01.01.2026

We hereby confirm that items delivered comply with following specifications:

This statement applies to PET Clear, Black, Coloured mono sheet and laminated sheet which includes Weldable PE, Peelable PE & EVOH PE.

We confirm that the delivered material is suitable for Direct Food Contact applications. The material is a Co-extruded sheet (ABA layer). The 'A' layer (Virgin) is the functional barrier layer; central 'B' layer contains Post Consumer (PCW) & Post Industrial (PIW) Recycled materials. In the case recycled materials within their structure the functional barrier used under the expected terms of use is effective and in accordance with the requirements Plastics Regulations.

Country of origin for Raw Material which is used in our suppliers' sheet is made and purchased within the UK. Additives i.e. Internal Anti-block, Silicon and Anti-Fog are purchased from the EU.

NIAS Based on the analytical protocol used by external accredited laboratories for the evaluation of NIAS on behalf of our supplier, no potentially dangerous compounds were found in potentially dangerous quantities. Our supplier is in constant analytical updating as far as the issue related to NIAS is concerned.

The material complies with the requirements of the following legal regulations:

- EU Regulation 10/2011 Plastic Materials and Articles Intended to Come in to Contact with Food and subsequent amendments up to (EU) EU 2020/1245 (and includes all amendments amended by the EU Commission regulation 2023/1442, 2023/1627) & 2025/351.
- EU Reg No 2016/1416
- EU regulation 2022/1616
- Directive 1935/2004 and EC 2023/2006
- Directive 94/62 EC Heavy Metal Determination
- UK legislation 2012 no.2619
- Compliance with Packaging (Essential Requirements) Regulations 2015

Regulation 10/2011 requires that no plastic material shall be capable of transferring its constituents to food with which it may come into contact in quantities exceeding the appropriate limit. For the material the appropriate limit is 10mg/dm².

The compliance of the above-mentioned regulations including total migration also has to be tested for the intended application by the end user. There are no limitations as to the use of our supplier' sheet.

We declare that products marketed comply with UK and EU legislation and are suitable for contact with food intended for human consumption in accordance with Regulation 10/2011 of the European Community.



Migration:

Inspection of migration and residual contents are regularly repeated to guarantee the limiting values are maintained. The tests carried out comply with EU Regulation 10/2011. Migration was carried out over Volume /Surface to Volume ratio cm²/cm³ at 1.60.

OVERALL MIGRATION

1) Aqueous Overall Migration:

- samples were cut to 2dm² and exposed to 100mL aqueous simulant (10% v/v aqueous ethanol and 3% w/v aqueous acetic acid) by total immersion for 10 days at 40°C.

2) Olive Oil Overall Migration:

- 2dm² of the samples was conditioned to constant weight and exposed, by total immersion, to 100mL of olive oil for 10 days at 40°C. The exposure was carried out in quadruplicate for each sample.

In the following table are reported the values obtained:

TEST METHOD	SIMULANTS	CONDITIONS OF CONTACT 40°C	ANALYSIS DESCRIPTION	AVERAGE VALUE	LIMITS
UNI EN 1186-3-2022	ACETIC ACID 3%	10 DAYS / 40°C	Medium overall migration	2.03	<10 mg/dm ²
UNI EN 1186-3-2022	ETHANOL 10%	10 DAYS / 40°C	Medium overall migration	1.59	<10 mg/dm ²
UNI EN 1186-3-2022	OLIVE OIL	10 DAYS / 40°C	Medium overall migration	2	<10 mg/dm ²

RPET sheet do not contain any adhesives or has been printed. If this is subsequently carried out by the end user, then further testing will be required.

SPECIFIC MIGRATION

Only those monomers listed in the Union List Regulation are used to manufacture the material. The substances that have Specific Migration Limits (SML's) or restrictions are listed below:

Substance	Regulation Reference	
Terephthalic Acid	PM/Ref 24910	SML 7.5 mg/kg
Isophthalic Acid	PM/Ref 19150	SML 5 mg/kg
Ethylene Glycol	PM/Ref 16990	SML 30 mg/kg (total)
Diethylene Glycol	PM/Ref 15760	
Antimony based catalyst	PM/Ref 35760	SML 0.04 mg/kg
Titanium Nitride	PM/Ref 93485	Addition Rate <20ppm

Test Materials have been tested in accordance with EU Directives for food contact with all aqueous and fatty food types. The results demonstrate that the polymer meets the migration limits as above when tested for 10 days at 40° C in simulants specified by the Regulation EU 10/2011 using test methods EN1186 1,2 and 3. For all the general migration test we use for overall migration the conditions OM2 (10 days - 40°C) and this condition covers any long-term storage at room temperature or below, including when packaged under hot-fill conditions, and/or heating up to a



temperature T where $70\text{ }^{\circ}\text{C} \leq T \leq 100\text{ }^{\circ}\text{C}$ for a maximum of $t = 120/2^{((T-70)/10)}$ minutes." and we use the simulants A-B-D2 to demonstrate the conformity for all types of food.

On the basis of risk assessment approaches conducted by representative sample of product category in the following table are reported information about specific migration:

SUBSTANCE	CAS NUMBER	Simulants	Conditions of Contact	TEST METHOD	SML (mg/kg)	VALUE (mg/kg) (REPRESENTATIVE SAMPLE)
TEREPHTHALIC ACID	000100-21-0	ETHANOL 10%, 3% ACETIC ACID AND OLIVE OIL	10 DAYS / 60°C	P-AL-317 Rev 0 2023	<7.5	<2.0
ISOPHTHALIC ACID	000121-91-5	ETHANOL 10%, 3% ACETIC ACID AND OLIVE OIL	10 DAYS / 60°C	P-AL-317 Rev 0 2023	<5	<2.0
DI-ETHYLENE GLYCOL	000111-46-6	ETHANOL 10%, 3% ACETIC ACID AND OLIVE OIL	10 DAYS / 60°C	P-AL-87 Rev 1 2019	<30 (EG+DEG)	<0.48
ETHYLENE GLYCOL	000107-21-1	ETHANOL 10%, 3% ACETIC ACID AND OLIVE OIL	10 DAYS / 60°C	P-AL-87 Rev 1 2019	<30 (EG+DEG)	<0.48

Intentionally added substances not subject to listing in the Union List comply with the relevant requirements of the Framework Regulation and a risk assessment in accordance with Article 19 of the Plastics Regulation has been performed.

A generic risk assessment based on existing scientific data and on established end uses has been carried out and there is currently no evidence other PET contains Non-Intentionally Added Substances (NIAS) that would be of concern.

The material complies with the requirements of FDA regulation for material in contact with food 21 CFR 177.1630 – Polyethylene Phthalate Polymers.

The material does not contain substances listed in point 1 of Annex II of the Plastics Regulation or release Primary Aromatic Amines.

Our supplier declares that a Phosphorous based food additive E338 is used in the manufacture of Virgin pellet and is regarded as a dual use additive that complies with purity limits 2008/84/EC. Food Additive E338 is also listed in Regulation 10/2011 and can be used without restriction.



Our supplier confirms that there is no addition of the following during the manufacture of material:

- Allergens listed in Regulation (EU) No 1169/2011 as part of their formulation.
- BHA / BHT nor are they used or generated during the manufacture of Apet / Rpet sheet supplied.
- Animal derivatives
- Plasticiser
- Any nano particles (including Titanium Nitride) and Aromatic Amines.
- Epoxy derivatives (1895/2005/EC)
- PVC
- Polycyclic Aromatic Hydrocarbons
- Any substance on the candidate list for SVHC
- Cadmium, Mercury, Lead or Chromium or their compounds
- GM Materials
- Halogens
- Latex
- Epoxidised Soya Bean Oil (ESBO), Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)
- Brominated flame retardants - a group of chemicals which are used as flame retardants in fabrics and plastics. Most textiles with flame proofing currently use brominated flame retardants.
- Bisphenol A and Bisphenol S - used in the manufacture for food cans and lids and is the main ingredient in polycarbonate plastics and the oil industry. Phthalates (specifically DEHP, DBP, BBP, DINP, DMEP, DPP, DiPP, BBP and DiBP) - a group of chemicals used as plasticisers in many PVC products, glues and inks and as solvents in cosmetics.
- Alkyltin - compounds used as preservatives, antibacterial agents and catalysts in the production of some plastics. Also called organotin compounds.
- Alkylphenols and their derivatives
- Artificial musks such as nitro musks and polycyclic musks
- Triclosan - a chlorinated organic anti-bacterial chemical with close structural similarities to dioxins and furans.
- Any fluorides or compounds containing fluorides.
- Perfluoro-octanyl sulphonate and Perfluoro-octanic acid (PFOS and PFOA)
- Prop 65 list last updated 23.12.2023.

As defined in the Reach Regulations as material is a polymer there is no requirement to register. Our supplier can confirm that raw materials suppliers have declared that their substances used by our supplier are REACH registered where required.

The Plastic Regulation EU 10/2011 specifies certain responsibilities across the entire supply chain for food contact materials and articles. Therefore, to comply with EU 10/2011, it is the responsibility of the downstream user to conduct appropriate risk assessment which may include migration analysis to assess the effect of this downstream processing on the final food contact article.

With regards to EC2023/2006 our supplier has well equipped quality control to ensure conformance of incoming raw materials with specification stipulated in our Quality Assurance System. Our supplier also monitors processing conditions during each stage of the production process and has a strict control of non-conforming products through an organized Quality Assurance System.



EC Regulation 2022/1616 – The recycled sheet is in compliance with this regulation on recycled plastic materials and articles intended to come into contact with foods. The plastic input, the recycling process and the recycled plastic meets the specifications laid out in 2022/1616. Also, the quality assurance system according to Section B of Annex to Regulation (EC) 2023/2006 is in place. Our supplier is also an authorized recycling processor with the following EU Register number RECYC 100. Statement of compliance with the European Standard EN 13427:2004 and the international standard ISO 18601:2013.

Heavy Metals:

The material supplied is free from heavy metals according to directive 94/62 EC including amendments 2004/12/EC and 2005/20/EC. No hazardous substances are contained in material supplied.

Perfluorocarbons (PFC's), Hydrofluorocarbons (HFC's), Regular Chlorofluorocarbons (CFC's), Poly and Perfluoroalkyl Substances (PFASs):

Our supplier confirms there are no PFAS in the material we produce and we also have documents from our Material suppliers stating what we state as PCW we use is from Plastic bottles. Our supplier confirms that PFC's, PFA's, HFC's, CFC's are not intentionally used in or generated during the extruding process of Apet/Rpet supplied including those listed below:

- Perfluoro Octane Sulfonate (PFOS)
- Perfluoro Octanoic acid (PFOA)
- Perfluoro Nonanoic acid (PFNA)
- Perfluoro Decanoic acid (PFDA)
- Hydrofluorocarbons (HFC's)
- Regular Chlorofluorocarbons (CFC's)

Material meets the requirements of regulation (EU 2025/351, adopted on February 21, 2025, amends Regulation (EU) No 10/2011, which governs plastic material and articles intended to come into contact with food. It also updates Regulation (EU) 2022/1616 concerning recycled plastics and Regulation (EU) No 2023/2006 on good manufacturing practices.

Our supplier also holds on file statements from its Raw Material Suppliers.

Bisphenol Group - Bisphenol A (BPA), Bisphenol F (BPF), Bisphenol S (BPS)

Bisphenol group is present in certain food contact materials because it is used in the production of polycarbonate and epoxy-phenolic resins. Polycarbonate (PC) is a plastic widely used in articles such as infant feeding bottles, tableware (plates, mugs, jugs, beakers), microwave ovenware, storage containers, returnable water and milk bottles, and refillable water containers. Epoxy-phenolic resins are also used as an internal protective lining for food and beverage cans and as a coating on metal lids for glass jars and bottles. As far as our supplier are aware it is not used in the manufacture of APET resins or feedstocks. As a safety measure we have on file statements from our suppliers to state that BPA group is not present in products supplied to our supplier. The amount of Bisphenol equally permitted to migrate from food contact materials, such as packaging, into food - known as the specific migration limit - is based on the TDI. Material also complies with Legislation EU 2024/3190. Material sheet was also tested in October 2024 for Specific Migration and Content which Passed on both. All packaging materials tested and approved (as ours are) for suitability for direct contact with foodstuffs in line with Regulation 10/2011 and its amendment 2020/1245.



General:

Denest additives used are either internal anti block (for heat seal application) or food grade Silicone. On silicone coated sheet the dosage is 1:20 and there is no dual use. Sheet can also be coated with food grade Anti Fog and there is no dual use.

- The sheet complies and meets the minimum legal requirements that are set within the UK & EU.
- Our supplier is certificated to the BRC/IOP Global Standard for Packaging & Packaging Materials – Issue 7.
- All certificates/documentation are either available on request.
- The material complies with EU Packaging & Packaging Waste Directive (94/62/EC) and its amendment 2004/12/EC.
- Our supplier carefully observes new publications of the relevant laws and will inform the customer about changes in laws which are of importance with the use of this product.

December 2025

Don Plast 2003 A/S
Industrivej 11-13
DK-4180 Soroe

Casper Rosenfeldt