

Declaration of Compliance

7969_APET Matt_Black

The product consists of APET with mineral fillers to achieve a matt appearance. The product consists of ABA-structured APET with Virgin PET top layer/bottom layer and recycled PET (rPET) main layer, with or without absorber and adhesive on the edge for better sealing.

Products made from the above material comply with the following legislation:

- EU Regulation 1935/2004/EU, on materials and articles intended to come into contact with food, Article 3, Article 11, para 5, Article 15 and Article 17.
- EU Regulation 2023/2006/EU (Good Manufacturing Practice) up to and including amendment 2025/351/EU.
- EU Regulation 10/2011/EU up to and including amendment 2025/351/EU. According to 2025/351/EU, point 16, article 16 we will be in compliance with the documentation from our supplier regarding their degree of purity latest 16 September 2026.
- EU Regulation 2024/3190/EU (bisphenol A (BPA) and other bisphenols and bisphenol derivatives).
- EU Regulation 1907/2006/EU (REACH) request a statement for the last included amendment.
- EU Directive 94/62/EC of 20 December 1994 on packaging and packaging waste and amendments thereto.
- EU Directive 2025/40/EU (Packaging and Packaging Waste) and amendments thereto.
- Colour masterbatch: Resolution AP (89) or BfR recommendation IX.
- Absorber pads: Regulation 450/2009/EU and BfR recommendation XXXXV/, XXXVI/3 or LIII; FDA 21 CFR 177.1520.
- Adhesive (Absorber, MAPETII): 1935/2004/EU, Article 3, 2023/2006/EU, 10/2011/EU, FDA 21 CFR 175.105.
- US FDA 21 CFR: For additional information, request an FDA Declaration.

As the aforementioned regulations are continuously evolving, we will update our declarations accordingly. Therefore, we advise recipients to periodically request an updated declaration of compliance.

Data:

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| Intended use at food manufacturer | <p>The amorphous PET (APET) single-use containers are designed for packaging all types of foodstuffs under refrigerated and frozen condition, as well as for hot-fill and for heating up the foodstuff in the packaging for up to 70°C. Storage for the maximum of 30 days at room temperature or long-term storage at refrigerated and frozen condition.</p> <p>Hot-fill for this plastic container means the filling of the plastic container with foodstuff with a temperature not exceeding the advised maximum application temperature at the moment of filling, after which the food cools down to 50°C or below within 60 minutes, or to 30°C or below within 150 minutes.</p> <p>For APET packaging, heat Treatment is defined as for instance sterilization or pasteurization at temperatures up to 70°C.</p> |
| Intended use at end-user | Not suitable for heating in a microwave or oven. |
| Application temperature Min. (T) | Please note the following temperature guidelines: -40°C (0°C with adhesive on edge) |

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| <p>Max. (T) Softening point (Tg)</p> | <p>70°C (40°C with adhesive on edge and/or when equipped with an absorber) 76 ± 2°C</p> <p>Application temperature refers to the temperature of the surrounding environment where the packaging and food are placed. Room temperature, which can range from about 20°C to 25°C is typically referred to as ambient temperature. The maximum application temperature above is specified by the technical department in the Technical Data Sheet (TDS).</p> <p>APET (Amorphous Polyethylene Terephthalate) typically has a glass transition temperature around 75-80°C. To prevent deformation or other issues that could arise when the material is heated close to its glass transition temperature, the maximum application temperature for APET is set at 70°C.</p> |
| <p>Verification of Compliance</p> | <p>In accordance with Article 18.2 and 18.4 of Regulation 10/2011/EU.</p> <p>Overall Migration (OM2): Test conditions are selected in accordance with Annex V, Chapter 3, point 3.1, table 3 as: Simulant A (10% ethanol): 10 days at 40°C Simulant B (3% acetic acid): 10 days at 40°C Simulant D2 (olive oil): 10 days at 40°C</p> <p>See ANNEX 1, table 1 to this DoC for the results of Overall Migration (OM) test</p> <p>The overall migration test is a measure for the inertness of the material. Table 3 of Annex V defines the test conditions and gives explanations about the real-life conditions covered by the prescribed test conditions.</p> <p>Specific Migration (SM): Test conditions are selected in accordance with Annex V, Chapter 2, point 2.1.3, 2.1.4, and 2.1.5 as: Simulant A (10% ethanol): 10 days at 40°C Simulant B (3% acetic acid): 10 days at 40°C Simulant D2 (olive oil): 10 days at 40°C</p> <p>See ANNEX 1, table 2 to this DoC for the list of substances with restrictions (SML) according to 10/2011/EC, Annex I Table 1 & 2 and Annex II paragraph 1 and 2</p> <p>Specific migration testing applies to the substances that are listed in Annexes I and II. One or more of the substances used in the manufacture of this product are regulated by specific migration limits. Compliance with these limits is confirmed by the specific migration test.</p> |

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| | <p>The contact temperature is the temperature at the interface between the plastic layer and the foodstuff it is in contact with. The contact temperature must not be confused with the application temperature (oven temperature, airfryer etc.). The contact temperature is used for planning the test conditions of migration to ensure safety and suitability of the plastic material for food contact at the given conditions.</p> <p>According to Appendix V, Chapter 2, point 2.1.4 (b), food tray contact conditions of “10 days at 40°C” cover all storage times at refrigerated or frozen conditions, including hot-fill conditions and/or heating up to $70\text{ °C} \leq T \leq 100\text{ °C}$ for maximum $t = 120/2^{(T-70)/10}$ minutes.</p> |
| Foods covered | <p>All types of food.</p> <p>In accordance with 10/2011/EU, Annex III, Chapter 4, table 3; and Annex V, Chapter 2, point 2.1.2.</p> |
| Use of recycled plastic | <p>Yes. The product contains recycled PET (rPET).</p> <p>The product consists of recycled post-consumer PET waste that is collected and pre-processed in accordance with Art. 6 of 2022/1616/EC and decontaminated using one of the following recycling technologies: EFSA-Q-2023-00418; EFSA-Q-2023-00459; RECYC001; RECYC004; RECYC079; RECYC085; RECYC102; RECYC215; RECYC0126; RECYC210; RECYC212; RECYC227 or RECYC283.</p> <p>Throughout the manufacturing process, all individual batches of input materials, intermediate materials and final articles are identified by unique identification numbers. The final product is manufactured with full traceability in compliance with Article 5.1 of Reg 2022/1616.</p> <p>The Union Register numbers applicable to Faerch’s APET manufacturing process are provided in ANNEX 2, table 1 of this DoC.</p> |
| Functional barrier | <p>Yes.</p> <p>The A-layer is a functional barrier according to the definition in Article 3 of 10/2011/EU, i.e., with respect to Non-Intentional Added Substances (NIAS) and Intentionally Added non-listed Substances (IAS). The material or articles complies with the requirements of Article 13(2), (3) and (4) of this Regulation.</p> |
| Risk assessment | <p>In accordance with 10/2011/EU, Article 19, Non-Intentionally Added Substances (NIAS), detected above the detection limit of 10 ppb, not included in Annex I to the regulation are individually assessed based on internationally recognized scientific principles for risk assessment.</p> <p>ANNEX 1, table 3 of this DoC lists the NIAS substances identified in NIAS screening test.</p> |

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| Dual use additives | E338, E553b (E459 found in NIAS screening) |
| S/V ratio at migration test | 6 dm ² /kg |
| Max. acceptable S/V ratio | 20,0 dm ² /kg |

This document of compliance is made on basis of:

Documentation from suppliers

Overall migration & Specific migration, Risk Assessment of substances not included in the EU 10/2011, Annex I and Annex II

Faerch A/S, Holstebro



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ANNEX 1:

Table 1.: Overall Migration (OM)

| Simulant [Name] | Average of 3 single determinations [mg/dm ²] | OML Value [mg/dm ²] |
|--------------------|---|------------------------------------|
| 10% ethanol (A) | <1 | 10 |
| 3% Acetic acid (B) | <1 | 10 |
| Olive oil (D2) | <2 | 10 |

< overall migration value = not detectable above LOD

Ref.: Faerch A/S unpublished report 392-2021-00546501 (17012022)

Table 2.: Specific migration (SM)

| SM Substance [Name] | SM Substance [Cas No.] | Value [mg/kg]* | SML [mg/kg] |
|------------------------|---------------------------|-------------------|--------------------|
| Terephthalic acid | 100-21-0 | <0,15 | 7,5 |
| Ethylene glycol | 107-21-1 | <0,3 | 30 |
| Diethylene glycol | 111-46-6 | <0,3 | 30 |
| Isophthalic acid | 121-91-5 | <0,15 | 5 |
| Irganox 1076 | 2082-79-3 | <0,9 | 6 |
| Formaldehyde | 50-00-0 | <0,03 | 15 |
| Elements Lead (pb) | Annex II (table 1) | 0,0011 | n.d. |
| Elements Antimony (Sb) | Annex II (table 1) | 0,00083 | 0,04 |
| Elements | Annex II (table 1) | <LOD | Annex II (table 1) |
| CMR-PAA's | Annex II (point 2) | <0,0006 | 0,002 |
| non CMR Cat 1A/B-PAA's | Annex II (point 2) | <0,003 | 0,01 |

*Recalculated test results based on assumption that 1 kg of food is surrounded by 6 dm² (10/2011/EU art.17, 2d)

< specific migration value = undetectable over LOD

Ref.: Faerch A/S unpublished report 392-2021-00546501 (17012022)

Table 3: Not intentionally added substance (NIAS):

| NIAS Substance [Name] | NIAS Substance [Cas No.] | Risk assessment [result] |
|---|-----------------------------|-----------------------------|
| No substances were detected above the detection limit og 10 ppb | n.a. | Compliant |

Compliance is based on laboratory risk assessment or Faerch risk assessment

Ref.: Faerch A/S unpublished report 392-2021-00545803 (01022022)

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ANNEX 2

Table 1: EU register numbers for Faerch's APET manufacturing process

| Faerch's recycling process based on twin-screw extrusion technology: EFSA-Q-2023-00418 | | | | | | | |
|--|--|--------------------------------|--|----------------------------------|------------------------------|---------------------------------------|---------------------------------|
| RAN: TBP | | | | | | | |
| RON: DK0-0FY-003 | | | | | | | |
| RFN: | Site DK (holstebro): DK0-4I6-0FC | Site FR1 (Annecy): FRK-TLY-1FA | Site IT (Castelbelforte): ITC-MY4-1FO | Site PL1 (Murowana): PL4-GTU-1FM | Site ES (Buñol): ES5-4N7-0F6 | Site UK1 (Sutton): GB7-PLC-1FI | Site UK 2 (Durham): GB8-OMA-1F1 |
| RIN: | DK0-4HX-0IO; DK0-9XI-0IG; DK0-2DW-0IM. | FRK-CTD-1IB | ITC-ISN-1IH; ITC-I45-1IF; ITC-PJM-1IG. | PL4-ETG-1I7 | ES5-548-0IN | GB7-IIR-1I2; GB7-F1K-1ID; GB7-LWV-1IC | GB8-JI9-1IS; GB8-H5X-1IS |

| Faerch's recycling process based on Vacurema Basic technology: EFSA-Q-2023-00459 | | | Cirrec's recycling process based on EREMA Basic technology: RECYC283 | | Silver Plastics, based on the Reifenhäuser technology: RECYC299 | | |
|--|------------------------------|-----------------------------|--|------|---|------|-------------------------------------|
| RAN: TBP | | | RAN: TBP | | RAN: TBP | | |
| RON: DK0-0FY-003 | | | RON: DEA-0GW-1ON | | RON: DK0-0FY-003 | | |
| RFN: | Site ES (Buñol): ES5-4N7-0F6 | Site NL1 (DSF): NL2-B9J-1FF | Site NL3 (Standdaarbuiten): NL4-SPM-1FI | RFN: | Site NL2 (Cirrec): NL2-FP1-1FG | RFN: | Site HUN (Szombathely): DK0-4I6-0FC |
| RIN: | ES5-1J8-0I5 | NL2-PQJ-1IG | NL4-ZVG-1IJ | RIN: | NL2-KEP-1IK; NL2-Z15-1I1; NL2-HD8-1IF | RIN: | HU2-QZ6-1I5 |

| Coveris Starlinger Decon technology: RECYC0126 | | | | | | |
|--|----------------------------------|--------------------------------|--------------------------------|------------------|---|---------------------------------------|
| RAN: TBP | | | | | | |
| RON: DK0-0FY-003 | | | | RON: DEA-0GW-1ON | | |
| RFN: | Site DK (Holstebro): DK0-4I6-0FC | Site UK2 (Durham): GB8-OMA-1F1 | Site CR (Liberec): CZ0-SEO-1FR | RFN: | Site NL3 (Standdaarbuiten): NL4-SPM-1FI | Site PL2 (Skierniewice): PL7-H5Y-1FI |
| RIN: | DK0-1UE-0IU; DK0-2UJ-0I9 | GB8-ERB-1IP; GB8-SU6-1IT | CZ0-VBA-1IE | RIN: | NL4-DDQ-1IE | PL7-CRP-1IA; FRI-6DV-1IH; FRI-2ID-1IR |

TBP = Number to be provided by the Commission