DECLARATION OF CONFORMITY

Article: **Sheets of blue tinted PE - 600 x 400 mm**
Customer: **Bruyerre**

Customer art. ref.:

1. General

Indicate the component material(s) of the item:

- family of material: **Plastic**
- characteristic components, from inside to outside: **PEBD** - Is not and does not contain a functional barrier

Statement issued on: 17.12.2024

4.

4. Confirmation that those materials or items meet the relevant requirements of Food contact regulations

The materials and/or items covered by this DoC comply with the relevant requirements laid down in Framework Regulation (EC) N° 1935/2004/EC, Regulation (EC) N°2023/2006 and other European and national texts applicable, listed below:

- **Regulation (EU) n°10/2011 including all amendments up to (2023/1627) concerning plastic materials and articles intended to come into contact with food**
- Bisphenol A, **regulation (EC) n°2018/213**
- Epoxide derivatives (BADGE, NOGE, BFDGE), **regulation (EC) n°1895/2005**
- Substances of Very High Concern (SVHC) according Candidate List REACH
- Heavy metals (**directive 94/62/EC** as amended) and hazardous substances (**regulation (EC) n°1272/2008** as amended)

Particularities (to be completed as of publication of the list)

☒ Not applicable

☐ (EC)Regulation N° 450/2009 on active and intelligent materials and items intended to come into contact with food, specify the substance used and the number mentioned in the Community list:

☐ (EC)Regulation N° 2022/1616 on recycled plastic materials and items intended to come into contact with foods, specify the type of material and the authorization number of the recycling process, mentioned in the EC process register:

This declaration of compliance has been established in respect of the following (tick any appropriate boxes)

Declarations by suppliers of raw materials

Overall Migration testing

(Similar to Report E20-37436 - IANESCO – LAM Metallo - 120µm - MG2)

Contact conditions with samples	Simulating liquid	Migration result (mg/dm²)
10 days at 40°C	A : 10% Ethanol	0.7
10 days at 40°C	B : 3% Acetic acid	1
10 days at 40°C	D2 : Olive oil	1

Authorized maximal limits: ***10 mg/dm²***

☒ **Assessment of non-listed substances - Article 6 of (EU) Regulation N° 10/2011**

☒ Not applicable

☐ Risk assessment (article 19 of (EU) Regulation N° 10/2011)

☐ If not, list substances and information relevant to the risk assessment

Names	Identification CAS - EINECS - Material and items in contact with foodstuff (MICF) Reference N°.

Assessment of non-intentionally added substances:

☐ Not applicable

☐ Risk assessment (article 19 of (EU) Regulation N° 10/2011)

☒ If not, list substances and information relevant to the risk assessment

Names	Identification CAS - EINECS - MICFReference No.
Linear and Branched Alkanes (POSH)[(1)]	*Oligomers*
Alkenes (POMH) [(1)]	*Oligomers*
Arvin Substances[(1)]	

(1) *PlasticsEurope – RA for non-listed-substances and NIAS under Article 19 (Sept 2014) and "EU Exposure Matrix Project - Results" presentation given by R. Eisert at PIRA Conference on "Global Food Contact 2011" in Frankfurt, Germany, June 2011 (Cefic-FCA / EuPC / FPE / PlasticsEurope)*

5. Information on substances with restrictions

Specify below the substance(s) subject to restriction and migration limits

Name	Identification	Limits	Max content in the film (20µm)
hexafluoropropylene	PM ref 18430	ND	1.10^{-7} mg/6dm²
Hexene-1	PM ref 18820	SML = 3 mg/kg	0.06 mg/6dm²
vinylidene fluoride	PM ref 26140	SML = 5 mg/kg	1.10^{-7} mg/6dm²
octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	PM ref 68320	SML = 6 mg/kg	1.10^{-3} mg/6dm²
polyethyleneglycol	PM ref 77708	SML = 1.8 mg/kg	< 1.10^{-3} mg/6dm²
Aluminium	Annex II	SML = 1 mg/kg	< 0.1 mg/6dm²
Copper	Annex II	SML = 5 mg/kg	< 0.1 mg/6dm²
Iron	Annex II	SML = 48 mg/kg	< 1 mg/6dm²
Zinc	Annex II	SML = 5 mg/kg	< 1 mg/6dm²

Compliance with these limits was established by **Worst case calculation** and by **Specific Migration analysis for metals**.

In the case of tests, specify the simulant(s) and test conditions:

Migration testing – Annex II – Reg 10/2011(amendment 2020/1245)

(Report N°125474– Simulant : Acetic acid)*

Test / Method	Units	Results	Specification
Condition of test	***Days***	***10***	***Reg. (EU) 10/2011***
Temperature	***°C***	***60***	
surface / volume ratio	***dm²/L***	***6.0***	
Barium (BA) – CAS N° 7440-39-3	mg/kg	< 0.1 (1)	< 1
Cobalt (Co) – CAS N° 7440-48-4	mg/kg	< 0.01 (1)	< 0.05
Copper (Cu) – CAS N°7440-50-8	mg/kg	< 0.1 (1)	< 5
Iron (Fe) – CAS N°7439-89-6	mg/kg	< 1 (1)	< 48
Lithium (Li) – CAS N°7439-93-2	mg/kg	< 0.1 (1)	< 0.6
Manganese (Mn) – CAS N°7439-96-5	mg/kg	< 0.1 (1)	< 0.6

Zinc (Zn) – CAS N°7440-66-6	mg/kg	< 1 (1)	< 5
Aluminum (Al) – CAS N°7429-90-5	mg/kg	< 0.1 (1)	< 1
Nickel (Ni) – CAS N°7440-02-0	mg/kg	< 0.01 (1)	< 0.02
Arsenic (As) – CAS N°7440-38-2	mg/kg	< 0.01 (1)	ND < 0.01
Antimony (Sb) – CAS N°7440-36-0	mg/kg	< 0.01 (1)	< 0.04
Cadmium (Cd) – CAS N°7440-43-9	mg/kg	< 0.002 (1)	ND < 0.002
Chromium (Cr) – CAS N°7440-47-3	mg/kg	< 0.01 (1)	ND < 0.01
Europium – CAS N°7440-53-4	mg/kg	< 0.01 (1)	< 0.05
Gadolinium (Gd) – CAS N°7440-54-2	mg/kg	< 0.01 (1)	< 0.05
Lanthanum (La) – CAS N°7439-91-0	mg/kg	< 0.01 (1)	< 0.05
Terbium (Tb) – CAS N°7440-27-9	mg/kg	< 0.01 (1)	< 0.05
Lead (Pb) – CAS N°7439-92-1	mg/kg	< 0.01 (1)	ND < 0.01
Mercury (Hg) – CAS N°7439-97-6	mg/kg	< 0.01 (1)	ND < 0.01

(1) : Detection Limit

Information on dual-use additives

☐ Not applicable

☒ Where necessary, specify the relevant substance(s) below:

Name	Identification	Limits
Talc	E553b	-
Carbonate de calcium	E170	-
Iron oxide	E172	SML = 48 mg/kg
Titanium dioxide	E171	-
Fatty acids	E570	-
Silicon dioxide	E551	-
Dimethylpolysiloxane	E900	-

6. Information related to the intended use of the materials or items

Materials or items intended for infants and young children ☐ Yes ☒ Not verified

Type of food intended to be placed in contact:

Please note that it is the responsibility of both manufacturers of finished food contact articles and industrial food packers to ensure that these articles in their actual use comply with general imposed migration requirements.

☒ All types of food

Contact conditions (time and temperatures) corresponding to the input data

OM2: Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.

Thermal resistance:

Maximum: 90°C, whatever the heating mode
Minimum: - 20°C, without mechanical choc

Please contact your sale representative if you need specific temperature conditions

Maximum surface / volume ratio in contact with food used to establish compliance of the material or item (if applicable):
1kg of food packed in 6dm² of packaging

7. Functional barrier (FB) in the case of multilayer materials

☒ Not applicable

EXTRA INFORMATION:

We hereby inform you that the following substances are not used intentionally in the formulation of the articles mentioned above, therefore we do not foresee their presence.

- **Bisphenols (A, B, F, S…)**
- **Mineral oils** [(1)]
- **Nanoparticles**
- **CMR Substances (REACH / CLP 1272/2008)**
- **Persistent Organic Pollutants (Regulation (EU) 2019/1021 / REACH)**
- **Endocrine Disruptors (SVHC Lists / ED List I / Order of 28.09.2023)**
- **Dangerous substances (List Order of 30.08.2023)**
- **Phthalates**
- **Conflict Minerals (Tungsten, Tantalum, Tin, Gold)**
- **PFOA / PFOS / PFNA / PFHXS**
- **Allergens (according to regulation (EC) 1169/2011 / FALCPA)**

Note: [(1)] *Traces of white mineral oils authorized by Regulation (EU) 10/2011 can be found with Ref PM 95883.*
No analysis has been performed to verify the absence of these substances.

There may be traces of POSH (non-separable from MOSH), intrinsic part of the polyolefin oils and white mineral oils authorized in Regulation (EU) 10/2011.

UFC Flexibles BVBA – Wolfsveld 8 – 9570 LIERDE
Tel: +32 55 60 33 00 – Fax: +32 55 60 34 00

- Migration test of MOSH and MOAH – **PE Film** (Report AR-18-AA-*-01 Eurofins)

Substance	Contact conditions with samples	Limit German ordinance	Migration result	Quantification Limit
MOSH POSH	10 days at 40°C	- 60 mg/kg (Reg 10/2011)	0.78 mg/kg	0.6 mg/kg
MOAH	10 days at 40°C	0.5 mg/kg	< 0.15 mg/kg	0.15 g/kg

ENVIRONMENTAL INFORMATION

We declare that the above mentioned material complies with the provisions of **Directive (EU) 2018/852 amending Directive 94/62/EC**, as well as the Environmental Code (**Decree No. 2007-1467** – Book V – Articles R.543-42 to R.543 52) repealing **decree 98-638**.

This material complies with the essential requirements listed below:

Prevention by source reduction (NF EN 13428)	☒
Reuse (NF EN 13429)	☐
Recycling (NF EN 13430)	☒
Disposal and Energy Recovery (NF EN 13431)	☒
Recovery by composting and biodegradation (NF EN 13432)	☐
Noxious and Hazardous Substances (NF EN 13428/C)	☒
Heavy Metals : Content < 100ppm	☒

This certificate relates to the product as delivered.

PFAS DECLARATION

PFASs are, or ultimately transform into, persistent substances, leading to irreversible environmental exposure and accumulation. Due to their water solubility and mobility, contamination of surface, ground- and drinking water and soil has occurred in the EU as well as globally and will continue.
It has been proven very difficult and extremely costly to remove PFASs when released to the environment. In addition, some PFASs have been documented as toxic and/or bioaccumulative substances, both with respect to human health as well as the environment. Without taking action, their concentrations will continue to increase, and their toxic and polluting effects will be difficult to reverse.

They are found in many commonly encountered products, including non-stick cookware, waterproof/resistant materials, cosmetics as well as food and water sources.

The proposal was prepared by authorities in Denmark, Germany, the Netherlands, Norway and Sweden and submitted to ECHA on January 2023. It aims to reduce PFAS emissions into the environment and make products and processes safer for people.

It is in 2025 that the decision of the European Commission could be made public. It is

estimated that the restriction would then be effective from 2026/2027, with however temporary exemptions which could range from a few years to a dozen years for certain sectors, according to the current text of the proposal.
The PPWR restricts the use of PFAS currently authorized and requires limiting concentrations for the placing on the market for packaging intended to come into contact with foodstuffs.
It should be published in early 2025, with an effective gain 18 months after entering the vigor (T1/T2 2026).

Our products currently contain two substances considered to be PFAS :

PM ref 18430 – Hexafluoropropylene

PM ref 26140 - Vinylidene fluoride

These substances are monomers for the polymerization of a raw material (processing aid), authorized in regulation (EU) 10/2011 and subject to restrictions (table of Substances in Food Certificates).

Small amounts of these polymeric PFAS may be present in raw materials used by manufacturer in order to improve the film manufacturing process, and not to give a specific function of final products.

It's important to note that substances are authorized for food contact materials according to current applicable laws and regulations, and do not contain the type of perfluoroalkyl acids that are of most concern (PFOA / PFOS / PFNA / PFHXS).

R&D department and technical task force are working on a PFAS Elimination Project. We work jointly and actively with our suppliers in order to quickly find alternatives of non-fluorinated substances.

Manufacturer has already been testing several fluorine-free processing aids. We need time to assess the effectiveness of the materials tested and the quality of the film produced. The alternative for all our ranges will be made throughout the year 2025.
We should be able to offer our products developed without PFAS (PFAS Free NIA) by the end of 2025.

This certificate only concerns the products in question, in their delivery form.

REACH STATEMENT

We declare that the articles mentioned above do not contain substances of very high concern within the meaning of the REACH Regulation (EC) n°1907/2006 listed on the ECHA Candidate List (updated **07.11.2024**), at a concentration greater than 0.1% in mass/mass ratio.

The articles do not contain any substances subject to restrictions according to annex XVII of REACH. The articles do not contain any substances subject to authorization according to annex XIV of REACH (regulation (EU) 2022/586).

Substance of very high concern means a substance classified as carcinogenic, mutagenic or toxic for reproduction, class 1A or 1B, or a substance that is persistent, bioaccumulative and toxic or very persistent and very bioaccumulative, or a substance of equivalent level of concern and registered on the candidate list.

All substances contained in the products have been identified within the upstream supply chain. Each of the substances has been pre-registered with the ECHA or benefits from an exemption.

This information is sent in accordance with the communication obligations according to article 33 of the REACH regulation.

The absence of the above substances has not been verified by analyses and is declared on the basis of the information available to us from raw material suppliers. It is therefore not excluded that traces of these substances may be present unintentionally (among other things because they may be ubiquitous in the environment) or result from the specific characteristics of the raw materials or of the anufacturing process.

This declaration is valid on condition that there is no modification of material composition, that its intended use has not changed and in the absence of regulatory changes.

Compliance is understood to be subject to compliance with the conditions of storage, handling and use, taking into account the specific characteristics of the material or item, and the conditions such as prescribed by professional practices or codes.

In the event of changes to the nature of the packaged product, its composition or its intended use, as well as in the event of a change in the conditions for using the material or the item, the person for whom this declaration is intended must ensure the compatibility packaging / content for which s/he then accepts responsibility.

Cardboard disclaimer:
Roll material: If the product is wound on rolls with cardboard cores, the 5 last windings closest to the core are to be discarded. The outside 2 windings of the rolls are to be discarded as well.
Sheet material: If the product has carboard supports the 5 sheets closest to the cardboard are to be discarded.

Date: 17/12/24

UFC Flexibles BVBA
Wolfsveld 8
9570 Lierde