



## Declaration of Compliance

Lindner, hereby declare that the material we deliver to your company, referenced

### **TSP02 Film:**

is manufactured from Polyethyleneterephthalate (PET) polymers as identified with Code 1 in the list of Annexure 1 of Directive 97/129/EC in accordance with the procedure laid down in Article 1 of Directive 94/62/EC. The above-mentioned TSP02 film is manufactured with:

- monomers / starting substances all listed in Commission Regulation (EU) No 10/2011 of the 14<sup>th</sup> January 2011 (and its amendments) relating to plastic materials and articles intended to come in contact with foodstuffs.
- all additives either listed in the plastic Regulation (EU) No 10/2011. These additives also comply with the BFR (German federal institute for risk assessment, previously known as BgVV & BGA) Recommendation XVII, Polyterephthalic acid diolesters.

The film can be used for packaging, transporting and holding all types of foods and beverages (other than foods and beverages containing more than 50% alcohol) for use in the freezer, refrigerator, oven and microwave oven up to 200°C.

The above-mentioned TSP02 film complies fully with the requirements of Directive 1935/2004/EC on materials and articles intended to come into contact with food

The above-mentioned TSP02 film is produced by our supplier under ISO 22000 – Food Safety & Hygiene certifications, covering Good Manufacturing Practice (Regulation 2023/2006/EC) and HACCP (Hazard Analysis & Critical Control Points).

The above-mentioned TSP02 film is converted in our plant at Bedford England under the ISO 9001, ISO 14001 and BRC Consumer Products Management Systems, covering Good Manufacturing Practice (Regulation 2023/2006/EC) and HACCP (Hazard Analysis & Critical Control Points).

The above-mentioned TSP02 film does not contain epoxy derivatives and hence is in compliance with directive 1895/2005/EC and its amendments.

- (a) Bisphenol A Di-Glycidyl ether ("**BADGE**"),
- (b) 2,3-dihydroxypropyl ether (BADGE.H2O)
- (c) 3-chloro-2-hydroxypropyl glycidyl (BADGE.HCL)
- (d) (3-chloro-2-hydroxypropyl) – (2,3-dihydroxypropyl) ether {BADGE.H2O.HCL}
- (e) 3-chloro-2-hydroxypropyl ETHER (BADGE.2HCL)
- (f) bis (4-hydroxyphenyl) methane ("**BFDGE**"),
- (g) novolac glycidyl ethers ("**NOGE**")

The above-mentioned TSP02 film is in compliance with Directive 2005/84/EC amending Directive 76/79/EEC which puts regulation on the use of **Phthalates** given below, (This Directive states that such Phthalates "shall not be used as substances or constituents of preparations, at concentrations of greater than 0.1% by mass of the plasticized material"). We confirm that the Phthalates below are not added at any stage of production.

Bis (2-ethylhexyl) phthalate (**DEHP**), dibutyl phthalate (**DBP**), benzyl butyl phthalate (**BBP**), di-isononyl phthalate (**DINP**), di-isodecyl phthalate (**DIDP**), di-n-octyl phthalate (**DNOP**) & di-n-hexyl phthalate (**DNHP**).

- A new reduction factor should be introduced in migration testing (FRF) for **Lipophilic** substances. The above-mentioned TSP02 film does not contain any substance falling under the list of Lipophilic substances as given in 2007/19/EC.

### Migration Limits and Testing

The plastic materials used are not fully inert and there are substances, which can transfer or migrate from the plastic packaging into the food and vice versa. The migration of these substances is regulated by Directive 2002/72/EC (and its amendments) with two different migration limits:

- Overall Migration Limit
- Specific Migration Limits (SML)

### Overall Migration Limit

Directive 2002/72/EC as amended till (EU) 10/2011 limits the permissible overall migration limit i.e. the total quantity of substances released by the sample to 60 mg/kg or 10 mg/dm<sup>2</sup> under the test conditions set out in Annex III in accordance with the rules set out in chapter 3, section 3.1 of annex V.

S.NO	Test	Simulant used	Test condition
1.	Overall Migration Test (Hydrophilic & Lipophilic foods)	Simulant -A (10% Ethanol)	10 days at 40°C 4 hrs at 100°C
2.		Simulant -B (3% Acetic acid)	10 days at 40°C 4 hrs at 100°C
3.		Simulant -C (20% Ethanol)	10 days at 40°C 4 hrs at 100°C
4.		Simulant -D1 (50% Ethanol)	10 days at 40°C 4 hrs at 100°C
5.		Simulant -D2 (Rectified olive oil)	10 days at 40°C 2 hrs at 175°C
6.	Specific migration of Ethylene Glycol	Rectified olive oil	2 hrs at 175°C
7.	Specific migration of Antimony	In 3% Acetic Acid	4 hrs at 100°C

The above-mentioned TSP02 film meets the overall migration limits accordingly

### Specific Migration Limit

Directive (EU) No 10/2011 stipulates specific migration limits (given in mg/kg food) for certain substances. Above-mentioned TSP02 film meets the specific migration limits accordingly under the test conditions set out in Annex III in accordance with the rules set out in chapter 2, section 2.1 of Annex V. The specific migration values given in mg/kg food are converted to mg/dm<sup>3</sup> film surface by multiplying with the standard conversion factor 6, since by definition 1 kg food is enclosed by 6 dm<sup>2</sup> of film.

The following limitations apply under Directive 2002/72/EC as amended or as differently specified

PM Ref	CAS No;s	Substances	Limitations
16990	000107-21-1	Ethylene Glycol	SML (T) = 30 mg/kg <sup>(3)</sup>
35760	001309-64-4	Antimony Trioxide	SML = 0.04 mg'kg <sup>(39)</sup> (expressed as antimony)
24910	000100-21-0	Terephthalic Acid	SML = 7.5 mg/kg

We hereby declare that the above mentioned TSP02 film with the limit of specific migration for the substances as laid down in Regulation (EU) 10/2011 Annex I, table I.

The above mentioned TSP02 film can be used for cooking, packaging, transporting and holding all types of beverages (excluding beverages containing more than 50% alcohol) at temperatures above 250°F / 121°C.



**Restriction on materials and articles:** Regulation (EU) 10/2011 Annex II imposes the limit for the use of heavy metals. It states that plastic materials and articles shall not release the following substances in quantities exceeding the specific migration limits below:

Barium = 1 mg/kg	food or food simulant
Cobalt = 0.05 mg/kg	food or food simulant
Copper = 5mg/kg	food or food simulant
Iron = 48mg/kg	food or food simulant
Lithium = 0.6mg/kg	food or food simulant
Manganese = 0.6mg/kg	food or food simulant
Zinc = 25mg/kg	food or food simulant

Based on specific migration test results and suppliers declarations, we confirm that the above-mentioned TSP02 film complies with the specific migration limits for the above-mentioned metals.

- The above-mentioned TSP02 film does not contain substances for which the EC Directive 2002/72/EC imposes residual quantity limits (QM)
- Directive 2001/18/EC repealing council Directive 90/220/EEC on the deliberate release into the environment of genetically modified organisms (GMO). Based on our supplier's knowledge of their production processes, the above-mentioned TSP02 film does not contain GMO's.

### Use of Food packaging in the United States (FDA conformance)

The above-mentioned TSP02 film also complies with FDA regulations 21 CFR 177.1630 (a) (film made of Polyethylene Terephthalate Polymers) and specifications therein – (e), (f), (g), & (h) with regards to the results for net chloroform soluble fractions obtained from this film under the following conditions:

Dist. Water 120°F / 24 Hrs
n-heptane 120°F / 24 Hrs
8 % ethanol 120°F / 24 Hrs
Dist. Water 250°F / 2 Hrs
n-heptane 150°F / 2 Hrs
50 % ethanol 120°F / 24 Hrs

Thus the above-mentioned TSP02 film is suitable for food grade applications provided it is subject to limitations found in 21 CFR 177.1630 (e), (f), (g) & (h) and the film is used in accordance with the Good Manufacturing Practice – GMP regulations (defined in 21 CFR 174.5)

This film is a plain film (no coating is used) and the other substances/additives used in the film production are as per FDA regulation 21 compliance requirement.

### Other Regulations

Article 11 of EU Directive 94/62/EC, ELV Directive 2000/53/EC, RoHS Directive 2002/95/EC (as amended by 2005/618/EC) & 2003/11/EC: are aimed to restrict the use of such substances, Limits the concentration levels of heavy metals present in packaging.

Maximum concentration value of 0.01% by weight in homogenous materials for Cadmium and of 0.01% by weight in homogenous materials for Lead, Mercury, Hexavalent Chromium, Polybrominated Biphenyls (PBB) and Polybrominated Diphenyl Ethers (PBDE).

EU's Restriction of Hazardous Substances Directive (RoHS), decaBDE use has been exempted (in the limits of PBDE's) from RoHS beginning in 2005 and continuing for 5 years.

CONEG (Coalition of North-eastern Governors) legislation – USA of 1989: the sum of the concentrations of lead, Cadmium, Mercury and Hexavalent Chromium must not exceed 100ppm.

We confirm that in the manufacturing and conversion of above-mentioned TSP02, such heavy metals, PBB's or PBDE's and their compounds including decaBDE are not used and thus comply with the above-mentioned regulations.

## Other Regulations (cont'd)

The above-mentioned TSP02 film complies with the German „Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch, LFGB § 30 and § 31“ (book of legislations for food stuff, daily needs and animal feed) in the edition as of 01.09.2005 and „Bedarfsgegenständeverordnung“ (regulation for the use of daily needs) from 10.04.1992, modified on 21.12.2000 (Implementation of supplementary directive 99/91/EC)

Council Directive 78/142/EEC along with 80/766/EEC & 81/432/EEC lays down limits for the quantity of vinyl chloride monomer & its derived polymer (PVC) present in the plastic materials & articles intended to come into contact with foodstuffs. The above-mentioned TSP02 film complies with this regulation, as vinyl chloride monomers & its derived polymer (PVC) are not added either as main constituent or as additives during any stage of film manufacturing.

The above-mentioned TSP02 film complies with the requirements of Directive 2004/1935/EC as amended till Commission Regulation (EC) No 450/2009.

Commission regulation (EC) 282/2008 of 27th March 2008 on recycled materials and articles intended to come into contact with food, regulates the use of material produced from waste. As described in (Point no. 6 & 7 page-1 of 282/2008), off cuts and scraps from our suppliers production of the material, that have not been in contact with food or otherwise contaminated is re-melted on the premises into new product in compliance with the rules for good manufacturing practice laid down in Regulation (EC) 2023/2006. We hereby declare that above mentioned grades do not contain any recycled material produced by chemical depolymerisation, process; hence the above-mentioned TSP02 film complies with this regulation.

Above-mentioned TSP02 film is free from Latex content, as it is not used as main constituents or as an additive during any stage of manufacture or conversion.

This certificate is valid for 2 years.



Lindner Haushaltsprodukte GmbH  
Quality Management

Cologne, 01 January 2014

All reasonable care has been taken in the compilation of the information above. This information is given in good faith, and has been taken directly from technical documentation received from our raw material supplier based on their current state of knowledge.  
This certificate is only valid when the film is used in normal and foreseeable conditions, provided that the handling and storage conditions are also appropriate for preservation of the material's specific characteristics.