DECLARATION OF COMPLIANCE

Hereby:
EstPak Plastik AS
Sõnajala 11
92412 Kärdla
Hiiumaa
Estonia

Production plant:
Anti tee 2
76404 Saku vald
Harjumaa
Estonia

Declares, that our transparent**, black, blue, green, pink, yellow** color MONO **PP** (polypropylene) film and all products made of this film **MT38/805, MT45/1005, MT45/1005 UL, MT50, MT50 ABSORB, MT50 absorbent pad, MT254-50, MT254-50 absorbent pad, MT54/1105, MT54/1105 UL, MT70/1305 UL, MT70/1305 UL absorbent pad, MT455, MT555, MT475, MT605, MT705, MT755, MT805, MT855, MT905, MT1005, MT1205, MT1655, MT1655 L, MT1705, MT2205, MT2505UL, MT4005L, MT5005UL, GN1/2 50/5, GN1/2 50/5 absorbent pad, GN1/2 100/5, GN1/2 100/5 absorbent pad, NS790, NS900, NS1050, NS1250, NS1900, SC255, SC355, SC505, SC505F, SC755, SC755F, SC855, SC1005, SC3575, SC3575F:**

- are in compliance with Regulation No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to be in contact with food and under normal or foreseeable conditions of use, they do not transfer their constituents to food inquantities which could: endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof;
- comply with European Commission regulation no 10/2011 (and all its amendments);
- are manufactured in compliance with Good Manufacturing Practice (GMP) as described in Commission Regulation 2023/2006;
- comply with European Directive 94/62/EC: Packaging and Packaging Waste and does not contain lead, mercury, cadmium or hexavalent chromium greater than 100 parts per million (ppm);
- are potentially recyclable as described in European Directive 94/62/EC.

- EstPak Plastik AS management system is certified according to food safety standard FSSC 22 000, quality standard ISO 9001:2015 and environmental standard ISO 14 001:2015.
- EstPak Plastik AS products certified to the HALAL standard HCL.G2020 are:
  transparent trays MT50, MT50 with absorber pad, MT50 ABSORB, MT254-50, MT254-50 absorbent pad, GN1/2 50/5, GN1/2 50/5 absorbent pad, GN1/2 100/5, GN1/2 100/5 absorbent pad; and
  black trays GN1/2 50/5, GN1/2 50/5 absorbent pad, GN1/2 100/5, GN1/2 100/5 absorbent pad.

SML and NIAS

- To the best of our knowledge and based on the info recieved from our suppliers, the products might contain one or more intentionally or non intentionally added substances[1] with specific migration limits and/or restrictions defined in Annex I of regulation (EU) No 10/2011. Experimental tests or theoretical calculations of migration have shown that the specific migration limits (SML-s) – including those related to the metals of Annex II – were not exceeded under normal or foreseeable conditions of use. More information for your own risk assesment of actual use of finished article can be found in table below:

Substance	Identification No:	SML, mg/kg
1,3,5-Tris(3,5-di-tert-butyl-4-hydroxybenzyl)1,3,5-triazine-2,4,6-(1H,3H,5H)-trione	Cas: 27676-62-6	5
2,5-bis(5-tert-butyl-2-benzoxazolyl) thiophene	Cas: 7128-64-5	0.6
2,6-di-tert-butyl-4-ethylphenol	FCM: 477	4,8
3,5-di-tert-butyl-4-hydroxybenzylphosphonic acid, monoethyl ester,calcium salt	FCM: 715	6
4-tert-butylphenol	FCM: 186	0.05
9,9-bis(methoxymethyl)fluorene	FCM: 779	0.05
aluminium	Annex II	1
barium	Annex II	1
bis(4-propylbenzylidene) propyl sorbitol	Cas: 882073-43-0	5
cis-1,2-cyclohexanedicarboxylic acid, salts	Ref: 45704	5
copper	Annex II	5
cristobalite	FCM: 614	60
glycerides, castor-oil, hydrogenated, acetates	FCM: 783	0,05
methylene bis (4,6-di-tert butylphenyl) sodium phosphate	Ref: 66360	5
nickel	Annex II	0,02
N,N-bis(2-hydroxyethyl)alkyl (C8-C18)amine	Ref: 39090	1.2
N,N-bis(2-hydroxyethyl)alkyl (C8-C18)amine hydroclorides	Ref: 39120	1.2 (Expressed as tertiary amine excluding HCl)
octadecanoic acid calcium salt	Cas: 1592-23-0	60
octadecyl 3-(3,5-di-tert-butyl-4-hydrohyphenyl) propionate	FCM: 446	6
pentaerythritol tetrakis[3-(3,5-ditert-butyl-4-hydroxyphenyl)-propionate]	FCM: 496	60
phosphorous acid, tris(2,4-di-tert-butylphenyl)ester	FCM: 671	60
phthalic acid, dibutyl ester	Ref: 157	0.3
phthalic acid, bis(2-ethylhexyl) ester	Cas: 117-81-7	1.5
quartz	FCM: 616	60
stearic acid	Cas: 557-11-4	5 (expressed as Zn)
stearic acid zinc salt	Cas: 557-05-1	5 (expressed as Zn)
talc	Ref: 92080	60
tris(2,4-ditert-butylphenyl) phosphite	FCM: 671	60

[1] *Non intentionally added substances (NIAS) – impurities, reaction products or others. The presence of these substances depend on processing conditions. Some traces could be present, but to the best of our knowledge, theoretically, the restrictions are met. However, since this product is produced with processing equipment made of steel, there could be traces of Iron, Chromium and Nickel in the polymer.*

Dual Use Additives

- To the best of our knowledge and based on the info recieved from our suppliers, the products might contain substances defined as dual-use additives, approved as direct food additives under European Commission regulation 1333/2008 Annex II and III. More information for your own risk assesment of actual use of finished article can be found in table below:

calcium carbonate	E 170
titanium dioxide	E 171
ascorbyl palmitate	E 304
alpha tocopherol	E 307
citric acid	E 330
sodium, potassium and calcium salts of fatty acids	E 470a
magnesium salts of fatty acids	E 470b
mono- and diglycerides of fatty acids	E 471
polyglycerol esters of fatty acids	E 475
calcium hydroxide	E 526
talc	E 553B
fatty acids	E 570
calcium stearate	E 572
propylene glycol	E1520

Testing

- The overall migration (OML) of our products meetse the requirements and is confirmed by accredited Health Board Laboratory of Chemistry test protocols no CH4323/2021, CH4324/2021, CH8881/2021, CH3395/2020, CH3213/2022, CH3211/2022, CH8194/2022 and CH3212/2022 where tested food contact surface area was 1dm^2 and volume 100ml.
- The result of microbiological testing is minimal, Health Board Central Laboratory protocol NHL2022_U803UH.
- The sum of the content of lead, cadmium and hexavalent chromium and zinc is less than 100 ppm, Health Board Central Laboratory report no PM1138M, PM991M.

Conditions of use

- Conditions of use: all types of food

01	Beverages
02	Cereals, cereal products, pastry, biscuits, cakes and other bakers' ware
03	Chocolate, sugar and products thereof Confectionery products
04	Fruit, vegetables and products thereof
05	Fats and oils
06	Animal products and eggs
07	Milk products
08	Miscellaneous products

Table 2. Food category specific assignment of food simulants, Annex III, 10/2011/EU

- Application temperature for **transparent trays**: heating up to 70°C for up to 6 hours, or up to 121°C for up to 15 minutes, which is followed by storage at room temperature or below, contact time with food until the end of food shelf life. Microwave usage is allowed.
- Application temperature for **colored trays**: heating up to 70°C for up to 2 hours, or up to 100°C for up to 15 minutes, which is followed by storage at room temperature or below, contact time with food until the end of food shelf life.

- At temperatures + 70°C and above the mechanical properties of the final product must be assessed.
- If product consist of absorbent pad, restrictions apply for the application of final article, please see section *Information for products with absorbent pad* (last section of the declaration).
- Products are intended for single use packaging.
- Minimal filling requirements do not apply if containers are used as intended.

Storing and handling

- Suggested storage conditions in warehouse: products generally have to be stored in a dry warehouse wrapped into protective film; protected from UV radiance up to 5 years.

Information for products with absorbent pad

- Absorbent pad is ultrasound welded to the bottom of the container. Absorbent pad is in compliance with European Commission Regulation 450/2009 on active and intelligent materials and articles intended to come into contact with food. Absorbent pad's application temperature in food contact is long term storage at room temperature or below. The absorbing pad must be appropriately sized in order to absorb what is necessary (for not having liquid wandering)

Absorbent bad might consist substances that have restrictions in 10/2011/EC "positive list", which do not exceed specific migration limits under normal or foreseeable conditions of use:	
CAS No	**SML, mg/kg**
110-63-4	5
111-66-0	15
116-14-3	0,05
116-15-4	ND
119345-01-6	18
1333-86-4	60
13463-39-4	60
1663-39-4	6 (as acrylic acid)
2082-79-3	6
4724-48-5	0,05
57-11-4	5 (as zinc)
592-41-6	3
68441-17-8	60
7429-90-5	1
7439-89-6	48
7440-36-0	0,02
7440-39-3	0,04
7440-39-3	1
7440-50-8	5
7440-66-6	5
75-38-7	5
77-99-6	6
79-10-7	6
96-33-3	6
96-69-5	0,48
FCM16	6

Absorbent bad might consist dual-use additives, approved as direct food additives under European Commission regulation 1333/2008 Annex II and III, which have to be considered regarding to actual use of finished article:	
polyethylene glycol	E1521
calcium carbonate	E170
iron oxide	E172
citric acid	E330
calcium salts of fatty acids	E470a
mono- and diglycerides of fatty acids	E471
sodium hydroxide	E524
calcium oxide	E529
magnesium oxide	E530
silicon dioxide	E551
talc	E553b
fatty acids	E570

Disclaimer

- The information provided in this document has been carefully compiled, according to the producer's best knowledge.
- Please note that according to the above-mentioned regulations the business operator who is placing final food contact article on the market is responsible for the suitability check for the final food contact use.

Confidentiality

- The information provided for the SML substances, metals Annex II, dual-use additives and testing is considered confidential and is only to be used to evaluate the above mentioned product intended for food packaging applications and specifically the additives which are subject to a Specific Migration Limit in food contact regulations and/or the additives which are listed with restriction in the food regulations.

This document is valid for 3 years; in case of changes, it will be updated.

29.11.2022

Marek Harjak

General Manager
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This letter was compiled electronically, it is therefore valid without signature

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