Certificate of compliance for TDX Recoupet Rpet Food Packaging Material – Revision 26 14/10/2022:

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We hereby confirm that items delivered complies with the following specifications:

This statement applies to Rpet Sheet. We confirm that the supplied material is suitable for applications with direct food contact. The material is a co-extruded sheet (ABA layer). The A layer (Virgin) is the functional barrier layer; The B layer contains recycled materials. In the case of recycling materials within their structure, the functional barrier used under the expected conditions of use is effective and in accordance with the requirements of the Plastics Regulation.

RPET sheet complies with the requirements of the following legal regulations:

- EU Regulation 10/2011 Plastic Materials and Articles intended to come in contact with food and subsequent amendments up to (EU) EU 2020/1245
- EU Reg No 2016/1416
- Directive 1935/2004 and EC 2023/2006
- Directive 94/62 EC Heavy Metal Determination
- EU Regulation 2022/1616
- Executive order no. 681/2020 (food contact materials)

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/dm$_2$.

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 RPET sheet supplied.
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 in order to guarantee the limiting values are maintained. The tests carried out comply with EU Regulation 10/2011.

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 60°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 60°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	ANALYSIS DESCRIPTION	AVERAGE VALUE	LIMITS
UNI EN 1186-3:2002	Acetic Acid 3%	10 days / 60°C	Medium overall migration	0.5	<10 mg/dm2
UNI EN 1186-3:2002	Ethanol 10%	10 days / 60°C	Medium overall migration	0.3	<10 mg/dm2
UNI EN 1186-2:2002	Olive oil	10 days / 60°C	Medium overall migration	0	<10 mg/dm2

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 RPET material. The substances that have Specific Migration Limits (SML's) or restrictions are listed below:

FCM no.	Substance name	Regulation reference	SML (mg/kg)
785	Terephthalic Acid	PM/Ref 24910	SML 7,5 mg/kg
291	Isophthalic Acid	PM/Ref 19150	SML 5 mg/kg
227 263	Ethyleneglycol Diethyleneglycol	PM/Ref 16990 PM/Ref 15760	SML 30 mg/kg (total)
398	Antimony	PM/Ref 35760	SML 0,04 mg/kg
	Titanium Nitride	PM/Ref 93485	Addition rate <20 ppm

Test Materials have been tested in accordance with EU Directives for food contact with all aqueous and fatty foods. The results demonstrate that the polymer meets the migration limits as above when tested for 10 days at 60°C in simulants specified by the Regulation EU 10/2011 using test methods EN1186 1,2 and 3. 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 nummer	Simulants	Conditions of contact	Test method	SML (mg/kg)	Value (mg/kg) (repres.sample)
TEREPHTHALIC ACID	000100-21-0	Ethanol 10%, Acetic Acid 3% and olive oil	10 days / 60°C	MP 2111 rev 0 2013	<7.5	n.d.
ISOPHTHALIC ACID	000121-91-5	Ethanol 10%, Acetic Acid 3% and olive oil	10 days / 60°C	MP 2111 rev 0 2013	<5	n.d.
DI-ETHYLENE GLYCOL	000111-46-6	Ethanol 10%, Acetic Acid 3% and olive oil	10 days / 60°C	AR 2010/046/ACAP6	<30 (EG+DEG)	n.d.
ETHYLENE GLYCOL	000107-21-1	Ethanol 10%, Acetic Acid 3% and olive oil	10 days / 60°C	AR 2010/046/ACAP6	<30 (EG+DEG)	n.d.
ANTIMONY TRIOXIDE	001309-64-4	Ethanol 10%, Acetic Acid 3% and olive oil	10 days / 60°C	MP 1663 rev 4 2014	<0.04	n.d.

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.

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

RPET 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 duel 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 RPET 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
- Plasticisers
- 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
- 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)

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 282/2008 – RPET 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 282/2008. 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.

General:

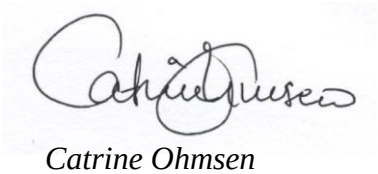
Denest additives used are either internal anti block (for heat seal application) or food grade Silicone. On silicone coated sheet the dosage is 1:20 and there is no dual use. Sheet can also be coated with food grade Anti Fog and there is no duel use.

- RPET 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 6.
- All certificates/documentation are available upon request.
- RPET 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.

Temperature area: Min. –25 degrees C. Max. +70 degrees C.
-25 degrees C. to + 40 degrees C. for unlimited time
+ 40 degrees C. to 70 degrees C. for max. 2 hours
The material is not suitable for heating, neither in ordinary oven nor microwave oven.

Area of use: Suitable for packaging of all types of food products

Date : 21. November 2022



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