

# Declaration of Compliance

## 9430\_PP Clear Impact\_Clear

The product consists of PP with a composition designed to achieve good impact strength while maintaining high clarity.

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

- o 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.
- o EU Regulation 2023/2006/EU (Good Manufacturing Practice) up to and including amendment 2025/351/EU.
- o EU Regulation 10/2011/EU up to and including amendment 2026/245/EU
- o EU Regulation 2024/3190/EU (bisphenol A (BPA) and other bisphenols and bisphenol derivatives) up to and including amendment 2026/250/EU.
- o EU Regulation 1907/2006/EU (REACH) request a statement for the last included amendment.
- o EU Regulation 2025/40/EU (Packaging and Packaging Waste).
- o EU Regulation 2025/40/EU regarding ELEMENTS article 5(4) & PFAS article 5(5)
- o Colour masterbatch: Resolution AP (89) or BfR recommendation IX.
- o Absorber pads: Regulation 450/2009/EU and BfR recommendation XXXXV/, XXXVI/3 or LIII; FDA 21 CFR 177.1520.
- o Absorber adhesive: 1935/2004/EU, Article 3, 2023/2006/EU, 10/2011/EU, FDA 21 CFR 175.105.

**FDA compliance status is assessed upon request. The status for the specific recipe is provided below:**

- o FDA compliance has been assessed for this specific recipe. The "FDA Food Contact Declaration" status is provided in Annex 2.

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:**

|                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Intended use at food manufacturer</b> | <p>Faerch's polypropylene (PP) single-use containers are designed for packaging all types of foodstuffs under high temperature conditions, as well as for hot-fill and heat-treatment of the foodstuff in the packaging for up to 121°C. Storage above 6 months at room temperature (20 – 25°C) and below.</p> <p>Hot-fill means the filling of the plastic container with foodstuff with a temperature not exceeding 100°C 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>Heat Treatment as for instance sterilization or pasteurization at temperature up to 121°C for up to 60 minutes.</p> |
| <b>Intended use at end-user</b>          | <p>Suitable for cooking or re-heating the foodstuff within the container in a microwave prior to consumption under the following temperature condition:</p> <ul style="list-style-type: none"> <li>• During heating in microoven, the temperature in the space between the food-contact surface of the plastic container and the food must not exceed 121°C for more than 1 hour.</li> </ul>                                                                                                                                                                                                                                                                                                 |

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|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Application temperature</b><br/><b>Min. (T)</b></p> <p><b>Max. (T)</b><br/><b>Melting point (Tm)</b></p> | <p>Please note the following temperature guidelines:<br/>Minimum temperature is based on the impact strength test<br/>PP High Impact: -40 °C (from -20 °C to -40°C – handle with care)<br/>PP Matt og PP Clear Impact: - 20°C (from -20 °C to 0°C – handle with care)<br/>PP Standard og PP Clear: 0°C (from 0°C to 5°C – handle with care)<br/>PP Medium Impact: below 0°C handle with care<br/>121°C (40°C when equipped with an absorber)<br/>~165°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 processing temperature above is specified by the technical department in the Technical Data Sheet (TDS).</p> <p>PP (Polypropylene) typically has a glass transition temperature (Tg) around -20°C to 0°C, the material undergoes a transition from a relatively brittle, glassy state to a more flexible rubbery state. However, the more relevant temperature for practical use is the melting temperature, which for PP is around 130-171°C and the maximum application temperature for PP is set to 121°C.</p> |
| <b>Verification of Compliance</b>                                                                              | <p>All our analyses are performed in laboratories accredited with DS/EN ISO/IEC 17025:2017.</p> <p>Regulation 10/2011, ANNEX V, Chapter 2, § 2.1.1 states that migration is determined on the material ( i.e., sheets) or article (i.e., trays), we test on the material.</p> <p>Compliance with migration limits is done in accordance with Article 18.2 and 18.4 of Regulation 10/2011/EU.</p> <p>.</p> <p><b>Overall Migration (OM5):</b><br/>Test conditions are selected in accordance with Annex V, Chapter 3, point 3.1, table 3 as:<br/>Simulant A (10% ethanol): 2 hours at 80°C<br/>Simulant B (3% acetic acid): 2 hours at 100°C<br/>Simulant D2 (olive oil): 1 hour at 121°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>                                                                                                                                                                                                              |

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|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <p><b>Specific Migration (SM):</b><br/> Test conditions are selected in accordance with Annex V, Chapter 2, point 2.1.3, 2.1.4, and 2.1.5 as:<br/> Simulant A (10% ethanol): 2 hours at 80°C + 10 days at 60°C<br/> Simulant B (3% acetic acid): 2 hours at 100°C + 10 days at 60°C<br/> Simulant D2 (olive oil): 1 hour at 121°C + 10 days at 60°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 &amp; 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> <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 Annex V, Chapter 2, point 2.1.4 (b), food-tray contact conditions of “10 days at 60°C” shall cover storage above 6 months at room temperature and below, including hot-fill conditions and/or heating up to <math>70^{\circ}\text{C} \leq T \leq 100^{\circ}\text{C}</math> for maximum <math>t = 120/2^{\wedge} ((T-70)/10)</math> minutes.</p> |
| <b>Foodstuff covered</b>       | <p>All types of food.<br/> In accordance with 10/2011/EU, Annex III, Chapter 4, table 3; and Annex V, Chapter 2, point 2.1.2.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Use of recycled plastic</b> | No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Functional barrier</b>      | No.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Risk assessment</b>         | <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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Dual use additives</b>      | E470a, E470b, E471, E475, E570                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|------------------------------------|--------------------------|
| <b>S/V ratio at migration test</b> | 6 dm <sup>2</sup> /kg    |
| <b>Max. acceptable S/V ratio</b>   | 20,0 dm <sup>2</sup> /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**

*Michael Lindholt*

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### ANNEX 1:

**Table 1.: Overall Migration (OM)**

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

< overall migration value = not detectable above LOD

Ref.: Faerch A/S unpublished report 392-2023-00145601 (12052026)

**Table 2.: Specific migration (SM)**

| SM Substance<br>[Name]                                                        | SM Substance<br>[Cas No.] | Value<br>[mg/kg]* | SML<br>[mg/kg]     |
|-------------------------------------------------------------------------------|---------------------------|-------------------|--------------------|
| aluminium hydroxybis [2,2'- methylenebis (4,6-di-tert-butylphenyl) phosphate] | 151841-65-5               | <0,56             | 5                  |
| 9,9-bis(methoxymethyl)fluorene (catalyst)                                     | 182121-12-6               | <0,015            | 0,05               |
| 2,2'-methylenebis(4,6-di-tert-butylphenyl) lithium phosphate                  | 85209-93-4                | <0,21             | 5                  |
| bis(4-propylbenzylidene)propylsorbitol                                        | 882073-43-0               | 0,0057            | 5                  |
| 1,2-cyclohezanedicarboxylic acid, salts                                       | FCM 816                   | <0,003            |                    |
| Atmer                                                                         | Ref 39090/39120           | 0,00051           | 1,2                |
| 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 dm<sup>2</sup> (10/2011/EU art.17, 2d)

< specific migration value = undetectable over LOD

Ref.: Faerch A/S unpublished report 392-2023-00145601 (12052026)

**Table 3: Not intentionally added substance (NIAS):**

| NIAS Substance<br>[Name]              | NIAS Substance<br>[Cas No.] | Risk assessment<br>[result] |
|---------------------------------------|-----------------------------|-----------------------------|
| Glycidyl oleate                       | 5431-33-4                   | Compliant                   |
| 3,4-Dimethylbenzaldehyde              | 5973-71-7                   | Compliant                   |
| Glycidyl palmitate                    | 7460-84-6                   | Compliant                   |
| Glycidyl Palmitate                    | 7501-44-2                   | Compliant                   |
| Tris(2,4-di-ter-butylphenyl)phosphate | 95906-11-9                  | Compliant                   |
| 2,4-di-tert-butylphenol               | 96-76-4                     | Compliant                   |

Compliance is based on laboratory risk assessment or Faerch risk assessment

Ref.: Faerch A/S unpublished report 392-2026-00130701 (12052026)

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### ANNEX 2:

#### FDA Food Contact Declaration

Under the regulations administered by the U.S. Food and Drug Administration (FDA), Faerch's PP CI – 9430 food packaging may be used in contact with all food types<sup>1</sup>, under Conditions of Use B through H<sup>2</sup>, as defined by the FDA.

PP CI – 9430 consists of olefin polymers that comply with 21 CFR 177.1520 (Olefin polymers), including §177.1520 (a)(1)(i), (b), and (c) 1.1a, 3.1a, or 3.2a, as applicable.

Any additives used in the formulation comply with their respective provisions in 21 CFR Parts 170 to 189, are substances generally recognized as safe in food and food packaging or are used in accordance with an applicable prior sanction or approval, and all are suitable for use in polypropylene food packaging under the conditions of use stated above.

Final articles manufactured from PP CI – 9430 comply with 21 CFR §174.5 (General Provisions Applicable to Indirect Food Additives).

The final articles also comply with the CONEG requirements, which limits the combined concentration of heavy metals (lead, cadmium, mercury, and hexavalent chromium) to 100 ppm.

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<sup>1</sup> I.e., food type categories I to IX in Table 1 of §176.170(c).

<sup>2</sup> §176.170(c), Table 2.