

DECLARATION OF COMPLIANCE



Note: This declaration of compliance provides certain regulatory related information regarding the below referenced products. It is provided in response to customer enquiry. Whilst reference is made in this declaration to the Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR), compliance of packaging with the requirements of PPWR, in particular the assessment of conformity with Articles 5 to 12 and the technical documentation according to Annex VII, is the legal obligation of the manufacturer (brand owner) placing packed products on the market. Information in this document related to PPWR is provided by us under Article 16 as supplier of packaging materials. This declaration is not a manufacturer's Declaration of Conformity under PPWR.

Product reference: **SMM (X) (A)/ Polyvinylchlorid(PVC) stretch film for food packaging**

as supplied by: Berry Plastics GmbH
Goethestr. 61, D-68753 Waghäusel, Germany

for application: food-contact applications

The composition of this product can be summarised as follows:

Table 1 – Product Composition

Film Composition	Polyvinylchlorid (PVC)		
Biobased Content (Art. 8 of PPWR)	No		
Compostable (Art. 9 of PPWR)	No		
Recycled Content (see details below)	☐ Yes	☒ No	☐ Certificate available
Hazardous Good (UN-Certification)	☐ Yes	☒ No	
Recyclability (PPWR)	See Environmental Information section below		
Labelling Requirements (PPWR)	See Environmental Information section below		

The exact blend of materials used is Amcor proprietary information.

1. Product Materials – regulatory status

This product is intended for **food-contact applications**.

This product complies with Regulation (EC) No 1935/2004. In particular, it is manufactured under good manufacturing practices, from components and ingredients which are declared by our suppliers as suitable for food contact use, and is therefore considered to comply with the general safety requirements (Art. 3). We also comply with Art. 11(5), the provisions on labelling (Art. 15), declaration of compliance (Art. 16) and traceability (Art. 17). See below for details on the conditions of use.

Our good manufacturing practices meet the requirements of Regulation (EC) No 2023/2006.

The following table lists the regulatory status of the materials used in manufacturing our product:

Table 2 – Regulatory status of Product materials.

Material	Legal Reference	Status (**)
plastics	Regulation (EU) No 10/2011 (*)	monomers & additives listed see below for further compliance aspects.
plastics	BfR Empfehlung III Polyethylen	complies.

recycled plastics	Regulation (EU) No 2022/1616	recycled plastics in scope of Reg. 2022/1616 are not used.
active & intelligent	Regulation (EC) No 450/2009	A&I are not used.
vinyl chloride monomer	Directive 78/142/EEC	SML = 1 mg/kg in final product (Table 4)
Bisphenol A and other bisphenols	Regulation (EU) 2024/3190	See the statement below this table
epoxy derivatives	Regulation (EC) No 1895/2005	epoxy is not used.
nanomaterials	Recommendation 2022/C229/01	nanomaterials are not used
biocides	Regulation (EU) No. 528/2012	biocides are not used.
PFAS	Regulation (EU) 2025/40; (PPWR), Art 5(5)	PFAS are not used; based on testing of relevant samples our product is in compliance with the limit of Article 5 point 5(c); a method to test for the limits in points 5 (a) and (b) does not yet exist.
colourants in plastic	CoE Res. AP (89) 1.	n.a.

(*) Regulation (EU) No 10/2011 was amended by Regulations 321/2011, 1282/2011, 1183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/213, 2018/831, 2019/37, 2019/1338, 2020/1245, 2023/1442, 2023/1627, 2024/3190, 2025/351, 2025/2240 and 2026/245. Reference to Regulation 10/2011 in this document includes these amendments unless noted otherwise.

(**) The term “used” refers to intentional presence in our raw materials or added during manufacturing. We cannot exclude trace impurities or incidental contaminants.

Regulation (EU) 2024/3190 as amended by Regulation (EU) 2026/250, on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives in materials and articles intended to come into contact with food.

This Regulation entered into force on 20 Jan. 2025 and bans the use of BPA and certain other bisphenols in the manufacturing of food contact materials from 20 July 2026 (20 Jan. 2028 if used on the outside of a metal layer). Based on information currently available from our raw material suppliers, we can confirm that the product referred to above:

- is not manufactured using BPA or its salts;
- is not manufactured using other bisphenols or bisphenol derivatives.

This confirmation is to the best of our knowledge and not based on testing. Should we receive different information through our supply chain during the ongoing transition period, we will inform you.

2. Further details on EU food contact compliance:

2a. Conditions of use

Taking into account the relevant legal provisions as well as the formulation of our raw materials and the OML and SML compliance information reported below, we can give clearance for the use of our product in contact with food in the following conditions of use:

- single use applications only
- intended food contact side: both sides
- food types:

The following film thicknesses are suitable(✓) or not suitable(✗) for the following food types:

Film thickness code	whole, cut, or peeled fruit and vegetables	all types of meat, including game and poultry (fresh and processed)	sandwiches	fish & cheese	butter & margarine
SMM(X)(A) 15-24	✓	✓	✓	✓	✗
SMM(X)(A) 25-28	✓	✓	✓	✗	✗

- packed food storage conditions: Maximum 30 days at room temperature and any long-term storage at refrigerated or frozen conditions, including when packed under hot-fill conditions, and/or heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.
- Microwave use for heating to the temperatures and for the durations specified above is permissible, provided the food does not come into contact with the stretch film.

NOT suitable for:

- foods that consist exclusively of fats or are preserved in oily media
- General use in conventional and microwave stoves

The highest surface to volume ratio for which the compliance of this product has been assessed, is 6 dm²/kg.

2b. Overall Migration Limit

Our product is a plastic as defined in the scope of Regulation (EU) No 10/2011, and therefore subject to an Overall Migration Limit (OML) as laid down in Article 12 of the Regulation.

In testing for verification of the OML we follow the methods that have been laid down in the EN 1186 series of standards by CEN.

2c. OML test conditions

The global migration value is lower than the admitted threshold value(for the above mentioned conditions of use).The tests are performed according to Art. 17 and 18 of Regulation (EU) No. 10/2011 in conjunction with Annex V.

The conformity has been assessed with a surface/volume factor of 6 dm²/liter by total immersion in simulant A (10% ethanol), B (3% acetic acid) European Standard EN 1186-3:2002-07 and stimulant D2 (olive oil), for all at the conditions 10d /40°C or simulant D2 (isooctane) at the conditions 24h / 40°C according to European Standard EN 1186-15:2002-12, and, in addition, the determination of overall migration into simulant E Tenax® (modified polyphenylene oxide, MPPO) for dry foods.

The determination of overall migration was carried out in accordance with the European standard EN 1186-13 b: 2002-12.

The OML test results have been taken into account in the conditions of use reported in section 2a.

2d. Specific restrictions on substances in plastics.

Our product contains one or more plastic components regulated by Regulation (EU) No 10/2011. This Regulation provides specific restrictions on monomers, starting substances and additives used in the manufacturing of plastics.

Some or all of the restricted substances listed in Table 4 may be present in the finished material:

Table 4 – specific restrictions on substances in Annex I of Regulation (EU) No 10/2011.

FCM-No.	PM ref.	Substance name	CAS No.	Restriction (***)	Status (Table 5)
00532	88640	soybean oil, epoxidized (ESBO)	8013-07-8	SML = 60 mg/kg	8
00798	92200	terephthalic acid, bis(2-ethylhexyl)ester (DEHT)	6422-86-2	SML = 60 mg/kg	8
00974	74050	phosphorous acid, mixed 2,4-bis(1,1-dimethylpropyl)phenyl and 4-(1,1-dimethylpropyl)phenyl triesters	939402-02-5	SML = 10 mg/kg	4
00207	31920	adipic acid, bis(2-ethylhexyl) ester	103-23-1	SML = 18 mg/kg	8
00775	45705	1,2-cyclohexanedicarboxylic acid, diisononyl ester	166412-78-8	SML = 60 mg/kg	8
00008	30401	acetylated mono- and diglycerides of fatty acids	---	SML = 60 mg/kg	8
00073	76866	polyesters of 1,2-propanediol and/or 1,3- and/or 1,4-butanediol and/or polypropyleneglycol with adipic acid, which may be end-capped with acetic acid or fatty acids C12-C18 or n-octanol and/or n-decanol	---	SML = 30 mg/kg	8
---	---	Zinc	---	SML = 5 mg/kg	4
---	---	primary aromatic amines	---	SML(T) = ND; DL = 0.002 mg/kg	4
May contain traces of the following substances, which are not part of the formulation used in the manufacturing process of this product:					
00127	26050	vinyl chloride	75-01-4	SML = 1 mg/kg in final product	4
00433	68320	octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	2082-79-3	SML = 6 mg/kg	4
00680	94400	triethyleneglycol bis[3-(3-tert-butyl-4-hydroxy-5-methylphenyl) propionate]	36443-68-2	SML = 9 mg/kg	4
00640	54930	formaldehyde-1-naphthol, copolymer	25359-91-5	SML = 0,05 mg/kg	4
00231	10120	acetic acid, vinyl ester	108-05-4	SML = 12 mg/kg	4
00207	31920	adipic acid, bis(2-ethylhexyl) ester	103-23-1	SML = 18 mg/kg	4
		isododecane	93685-81-5	SML = 5 mg/kg for BfR	4

(***) Restrictions can be a specific migration limit (SML), a maximum concentration (QM) in the plastic, a maximum quantity per surface area (QMA), or a 'no detectable migration' (ND) requirement at a certain detection limit (DL). Suffix (T) indicates a combined restriction for 2 or more substances.

The above list of restricted substances is complete to the extent that accurate information was received from our raw material suppliers. The status with regard to the latest amendments of Regulation 10/2011 is as follows:

- Amendments up to 2024/3190 : fully covered by Table 4.
- Amendment 2025/351: partly covered by Table 4. Note that a transition period until 16 Sep. 2026 applies.
- Amendment 2025/2240 : fully covered by Table 4.
- Amendment 2026/245 : fully covered by Table 4

In accordance with the EU Guidelines on information in the supply chain, Table 4 does not include substances used in non-plastic materials (adhesives, inks and coatings) that are also listed in Regulation 10/2011 with a specific migration limit or other relevant restriction (except for generic entries for NCO and PAA where relevant). We confirm the compliance of these substances with the relevant restrictions under the conditions of use reported in Section 2.b of this document. Details on the identity of these substances and our compliance assessment, are part of our Supporting Documentation and are accessible to enforcement authorities on request.

2e. [Compliance with specific restrictions on substances in Table 4](#)

The specific restrictions on substances listed in Table 4, apply to our product and/or its plastic components. Our compliance assessment as summarized below is carried out on the basis of the surface/volume ratio

reported in section 2a above. The results of this compliance assessment have been taken into account in the conditions of use reported in section 2a.

Table 5 – compliance assessment for substances listed in Table 4.

Status (Table 4)	compliance status
4	compliance was verified by worst-case calculation
8	compliance was confirmed by specific test for this substance (****) test conditions used: 10 days at 40°C

(****) results obtained on sample(s) relevant for this specific restriction.

Contact us for more details on this compliance assessment if needed.

2f. Compliance with Annex II of Regulation 10/2011.

On the basis of information currently available to us, the compliance of our product with the substances listed in Table 1 of Annex II is ensured as follows:

- Substances of Annex II.1 that are disclosed by our suppliers as being used in our raw materials, are addressed in Table 4 of this document.
- Substances of Annex II.1 that arise from impurities in our raw materials are covered by our suppliers' statements of compliance with Article 19 of Regulation 10/2011 and/or Article 3 of Framework Regulation 1935/2004, or a specific supplier statement of compliance with Annex II.1.
- In addition we have carried out our own testing on a sample relevant for this product, and can confirm compliance with Annex II point 1 in the conditions of use mentioned in section 2a.

The compliance of our product with the provisions on Primary Aromatic Amines (PAA), if relevant for our product, is addressed in Tables 4 and 5 of this document. In accordance with the recommendations of FEICA, we use a detection limit of 0.002 mg/kg food or food simulant for all PAA species.

2g. Dual Use Additives

As required by Regulation (EU) No 10/2011 the following table identifies additives used in plastics which are also authorised as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008. In absence of a Union reference list of these substances, or a marking in the Regulation, there remains some uncertainty over precisely which additives are to be considered as dual use additives. Therefore the following information received from our suppliers could be considered preliminary:

Table 6 – dual use additives.

food additive	substance
E170	limestone (calcium carbonate, natural), no SML
E260	acetic acid, no SML
E339	disodiumphosphate, no SML
E464	hydroxypropylmethylcellulose, no SML
E470a	Calcium salt of fatty acids = Ca-stearate (Ref. Nr. 24550), no SML
E492	Sorbitan Tristearate FCM-Nr. 651, no SML
E495	sorbitan monopalmitate, no SML
E524	Sodium hydroxide, no SML
E551	Silicone Dioxide FCM-Nr. 504, no SML
E570	Fatty acids = Stearic acid (Ref. Nr. 24550), no SML

2h. Re-processing of plastic

In reference to Article 10 point 2 of Regulation 2025/351, the re-processing of plastic off-cuts and scraps has always been a normal practice during plastic film production to prevent/reduce the generation of waste. We confirm that our industrial practices on re-processing of plastic meet the requirements of Regulation 2025/351 and section C of the Annex to Regulation 2023/2006.

2i. Organoleptic properties

A test was carried out in accordance with DIN 10955.

The method of evaluation confirms the presence or absence of any off flavour to mineral water, cheese, and mortadella with a negative influence on the odour and taste. The intensity of any off flavour compared to the control is evaluated by 6 judges on a numerical scale:

0 = no difference in flavour

1 = flavour difference just perceptible

2 = slight off flavour (just definable)

3 = definite off flavour

4 = strong off flavour

One must remember that the experimental conditions of the test are much more severe than those of a long-term storage test and any flavour transfer therefore is more intense. Therefore, the upper limit of acceptability is 2.5.

Table 7 – organoleptic test result.

Sample	Numerical result odour	Numerical result flavour	Limit of acceptability
Mineral water	1,5	2,0	2,5
Cheese	0,0	0,0	2,5
Mortadella	0,0	0,0	2,5

The results of the test show that the tested sample is not a source of off flavour and odour to mineral water, cheese or mortadella.

3. Additional information on substances.

The information in this section is to the best of our knowledge and is based on information received from our raw material suppliers, which may be incomplete, or on spot testing. As such, incomplete or inaccurate information given here cannot be the cause of any claim or rejection or other liability inferred upon us.

3a. High degree of purity.

Amendment 2025/351 introduces the concept of “high degree of purity”. This applies to the selection of starting substances used to manufacture the polymer / plastic raw material. It is not a requirement on the manufacturing of our plastic intermediate and final articles as we don't use substances but instead various intermediate plastic materials and articles. The high degree of purity is also not a requirement on the migration of substances from our product.

Annex IV of Regulation 10/2011 as amended by Regulation 2025/351 requires confirmation of high degree of purity for substances obtained from chemical recycling through processes not covered by Regulation 2022/1616 (i.e. pyrolysis). In case such recycled plastics are used in our product, Table 2 of this document covers this requirement.

For other polymers and plastic raw materials, Regulation 2025/351 does not foresee any communication down the supply chain related to the high degree of purity of the starting substances used. Such confirmation is therefore only implicit in the compliance statements of our raw material suppliers with Regulation 10/2011 as amended; consequently we cannot give any explicit confirmation on this topic.

3b. Substances for which genotoxicity has not been ruled out.

Amendment 2020/1245 requires a flow of information in the supply chain on the potential presence of substances for which genotoxicity has not been ruled out according to the rules of the EFSA risk assessment methodology.

Should any of our suppliers disclose the presence of such substances for which genotoxicity has not been ruled out, this paragraph will be updated with any information that may be needed for a final risk assessment when this hasn't already been conclusive at our stage or upstream.

3c. Non-Intentionally Added Substances (NIAS).

Our suppliers have either explicitly confirmed that a risk assessment according to Article 19 of Regulation 10/2011 has been carried out, or have implicitly done so by confirming compliance with Regulation 1935/2004. Information on our assessment of NIAS is part of our supporting documentation and is available to the authorities on their request.

4. Environmental Information

Heavy Metals:

All raw materials and additives used to produce the referenced products are confirmed by their supplier to comply with:

- Directive 94/62/EC on Packaging and Packaging Waste, as amended *[applicable until 12 Aug. 2026]*
- Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR) *[applicable from 12 Aug. 2026]*
- the US Model Toxics in Packaging Legislation (formerly CONEG) and its state-level implementations

to the extent these laws require the combined concentrations of cadmium, mercury, lead and hexavalent chromium to be less than 100ppm. These heavy metals, or derivatives of them, are not intentionally added to any of the raw materials used in the manufacture of the referenced product.

PFAS:

PPWR restricts the presence of PFAS in food-contact packaging from 12 Aug. 2026. This is addressed in Table 2 above.

PPWR-other:

The following requirements of PPWR depend on the publication in coming years of additional rules, guidance documents, national and/or EU legislation for clarification of what information may become relevant for conformity assessments:

- minimisation of substances of concern other than heavy metals and PFAS (Art. 5)
- recyclability of packaging (Art. 6)
- minimum recycled content of plastic packaging (Art. 7)
- minimisation of packaging (Art. 10)
- labelling of packaging (Art. 12)

The Essential Requirements of Directive 94/62/EC remain in place until the Directive has been repealed by Regulation 2025/40. To the extent that the harmonised standards series EN 13427-13432 remain relevant for the manufacturer's conformity assessment with the PPWR, we can declare the following:

Our product is made of plastics which, according to Annex B of EN standard 13431:2004 provide a positive calorific gain upon incineration.

When used by itself, our product meets the requirements of EN 13430:2004 on packaging recoverable by material recycling, on condition that it is verified to fulfil all relevant local regulations and provided that appropriate facilities exist where the packed product is put on the market.

With regard to the requirement on source reduction, we point to Table 2 of EN 13427:2004 where it is explained that this assessment needs to be made at the level of the complete packaging system i.e. primary + secondary + tertiary packaging; consequently, it is out of our control.

REACH:

A copy of our REACH Regulation (EC) No 1907/2006 statement is included in Annex I.

5. BSE/TSE

Throughout the plastics converting industry, certain low-level additives which are based on fatty acids, fatty acid esters or glycerol that are derived from animal fats (tallow) are in widespread use; the use of these additives is generally considered to be unavoidable in many different types of plastics. Tallow itself is not used in our products.

However, it has to be pointed out that:

- these substances are approved for food-contact use.
- Regulation (EC) No 999/2001 and its amendments assure that Specified Risk Materials (SRM) are removed prior to production of the materials of animal origin from which the above-mentioned substances are derived.
- the production of these additives is subject to very severe processing conditions that meet or exceed the recommendations for complete inactivation of TSE agents.

We therefore are certain that no danger for human health can result from the above-mentioned additives to the extent that they are used in our product. Based on the above, we furthermore declare our products compliant with Section 6.4 "Tallow derivatives" of the "Note for guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products." (EMA/410/01 Rev. 3 – 2011).

6. Absence of chemical substances

Based on the information available to us, the following substances are not intentionally used in our raw materials nor added during manufacturing. Therefore our product is not expected to contain:

- acrylamide
- allergens listed in Annex II of Regulation (EU) No 1169/2011 as amended
- azodicarbonamide and semicarbazide
- asbestos
- brominated flame retardants
- substances intended to function as biocides and fungicides incl. dimethyl fumarate, paraben.
- Bisphenol A, Bisphenol S
- Bisphenol A Diglycidyl Ether (BADGE), Bisphenol F Diglycidyl Ether (BFDGE) or Novolac Glycidyl Ethers (NOGE)
- dioxins
- genetically modified organisms (GMO) or products containing GMO
- mineral oil solvents not listed in Reg. 10/2011, other mineral oil saturated hydrocarbons (MOSH), mineral oil aromatic hydrocarbons (MOAH)
- natural rubber or natural rubber latex
- nonylphenol or nonylphenol ethoxylate
- oxo-degradable substances or substances making our product oxo-degradable
- ozone depleting substances according to the Montreal Protocol
- perfluoro-octanoic acid (PFOA), perfluoro-octane sulfonic acid (PFOS), perfluoro-hexanoic acid (PFHxA), perfluoro-hexane sulfonic acid (PFHxS), perfluoro-nonanoic acid (PFNA), other perfluoro-alkyl carboxylic acids (PFCAs), perfluoro-alkyl phosphate esters (PAPs), perfluoro-alkyl acids (PFAA).
- photo-initiators, including benzophenone, benzophenone derivatives, isopropyl thioxanthone (ITX), etc.
- phthalate plasticizers
- phthalates used as technical support agent in polymer catalysis
- polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE)
- polychlorinated biphenyls (PCB)
- polycyclic aromatic hydrocarbons (PAH)
- post-consumer recycled waste
- titanium acetyl acetonate (TAA) or acetyl acetone
- triclosan
- UV-curing components

The absence of these substances has not been confirmed by testing. We cannot exclude trace impurities at insignificant levels resulting from incidental contamination or from impurities in precursors to our raw materials.

7. Disclaimer

This declaration is given in good faith and to the best of our current knowledge. It only covers the compliance status of our product (to the extent set out in this declaration) as it leaves our premises and does not imply any conclusions regarding technical aspects of the use of our product nor any unforeseen interactions of our product with the packaging process or the filling good.

This declaration replaces all previous declarations for the same specification/product. It remains valid for continuing supplies of the product until a change in the legislation or new scientific information change the legal status. At such time we will inform our customers accordingly. This declaration does not extend our obligations to customers that are set out in the terms and conditions of sale that apply to our supply of product to the customer.

This document is created electronically and is valid without signature

Annex I: REACH Statement

The REACH Regulation (EC) No 1907/2006 deals with the placing on the market and the use of chemical substances in the EU. Amcor Flexibles is aware of its legal obligations under the REACH Regulation and is committed to fulfilling them. We are, in the REACH terminology, a manufacturer of articles and a downstream user of substances.

The finished products we supply to our customers are articles. We generally do not have any obligations to register substances contained in our raw materials or products.

When requested, we assist our suppliers regarding our use of any substance, to allow the supplier to create a REACH compliant Safety Data Sheet (SDS). REACH compliant SDS are not required for the articles we supply.

The Candidate List of Substances of Very High Concern (SVHC) is regularly updated by the European Chemicals Agency (ECHA), and we monitor these updates on an ongoing basis. The current list can be found at <https://echa.europa.eu/en/candidate-list-table>. Most recently, 2 substance were added as of February 2026. We confirm that to the best of our knowledge none of our products contains any of the currently listed SVHC in a concentration of 0.1% or above. We will communicate with customers should this status change.

SVHC substances are not banned upon listing in the Candidate List, but rather they will be subject to a future decision on an Authorisation for their use and the conditions of that Authorisation. Nevertheless, there are immediate obligations from the inclusion of a substance on the Candidate List, which we are committed to comply with:

- if we receive information from a supplier, leading to a conclusion that one of our products contains a SVHC in a concentration of 0.1% or above, we have to immediately inform our customers;
- if a customer forwards us a question from a consumer, we have to reply within 45 days if our product contains any SVHC at 0.1% or above, giving the identity of the substance.

SVHC substances are inserted into Annex XIV, the Authorisation List, by amendments to the REACH Regulation. This is the starting point for manufacturers and importers of those substances to apply for an authorisation for specific continued use(s) after the listed 'sunset dates'. It should be noted that Articles 2 and 56 of the Regulation provide certain exemptions from Authorisation for substances used in food, food contact materials, cosmetics and medicinal products.

We try to anticipate future developments by monitoring ECHA's public [consultations](#) and [newsletters](#), as well as [amendments](#) to the Regulation. A consolidated version of the REACH Regulation is available on the European Commission website [here](#) and on the ECHA website [here](#).

In summary, Amcor Flexibles is meeting its REACH obligations and managing the information flow as required by the Regulation. Our products comply with the relevant provisions of REACH including Annexes XIV and XVII in as far as they are applicable to our products.