

Declaration of Compliance

for products made of plastic intended to come into contact with foodstuffs

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Product: SustaPVDF®FG natural colored (PVDF)

We herewith confirm that the semi-finished product mentioned above, as a product from intermediate stage of manufacture, is in compliance with the requirements of the following regulations:

- (EC) No 1935/2004 of the European Parliament and the Council dated 27th October 2004 applicable for materials and goods destined to come into contact with foodstuffs and for revocation of the directives 80/590/EEC and 89/109/EEC, Gazette of the European Communities L 338/4 dated 13/11/2004, as last amended by Article 5 of Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 06.09.2019, Article 3, paragraph 1 a) and b),
- Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code – LFBG) in the version of the notification on 15 September 2021 (BGBl. I p. 4253), last amended by Article 7 of the Ordinance of 27 September 2021 (BGBl. I p. 4530), §§ 30 and 3f
- Furthermore, the product meets the requirements of
- (EC) No 10/2011 of the Commission dated 14th of January 2011 on plastic materials and articles to come into contact with food, Gazette of the European Communities L 21/1 dated 15/01/2011, last amendments by Commission Regulations (EC) No 2020/1245 of 02 February 2020, Official Journal of the European Union L 288/1 of 03.09.2020, Chapter II, III and V.
- Decree on Consumer Goods in the version of the communication of 23rd of December 1997 (BGBl. 1998 I p.5), last modification by Article 1 of the Decree of 24th of June 2013 (BGBl. I p. 1682).

with regard to the composition and the migration behaviour.

The manufacturing of the product mentioned above is carried out according to the method „Good Manufacturing Practice“ (GMP), corresponding to the regulation (EC) No 2023/2006 of December 2006 applicable for the good manufacturing practice for materials and goods destined to come into contact with foodstuffs.

According to the regulation (EC) No 1935/2004, the traceability of our products is guaranteed at all levels and is carried out by means of the production number inscribed on the product label or the accompanying documents.

Testing conditions for migration tests based on the application

The product was tested according to the methods for “examination of utensils“ by means of several samples, according to the regulation B 80.30, 1 to 3 (EC) of the Official List of testing procedures according to § 64 LFBG (Germany), as well as the series of standards EN 1186, EN 13130 and CEN/TS 14234 “materials and goods in contact with foodstuffs – plastics“.

According to the general rules for migration tests, the total migration and the specific migrations of individual substances were determined by using food simulants and pre-defined testing conditions (time/temperature). The overall migration as well as the specific migration do not exceed the legal limits set out in directive (EC) No 10/2011 when used as specified in table 1(OML/SML).

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Table 1 - Determination of migration behaviour

Testing simulant	Testing conditions [OM2]	Intended contact with foodstuffs
Acetic acid 3%	10 days at 40 °C repeated contact	Single and repeated contact up to 30 days at room temperature or below, including heating up to 100°C for up to 15 minutes for all kinds of foodstuffs as well as a heating up to 121°C for up to 1 hour of foodstuffs, which are exclusively classified with simulant D2.
Ethanol 10 vol.%	10 days at 40 °C repeated contact	
Ethanol 95% as substitute for fat	2 hours at 60 °C repeated contact	
Isooctan as substitute for fat	4 hours at 60°C repeated contact	

The maximum permissible ratio of plastic surface to quantity of foodstuff is up to 6 dm² / kg

Information on substances used or their degradation products for which Annexes I and II of Regulation EU 10/2011 contain restrictions and / or specifications:

Substance		PM/Ref.Nr.	CAS-Nr.	Restrictions
Vinylidene fluoride	Monomer	26140	75-38-7	SML: 5 mg/Kg
Octadecyl 3-(3,5-di tert butyl-4-hydroxyphenyl)-propionate	Additive	68320	2082-79-3	SML: 6 mg/Kg

OML = total migration (OML) <10mg / dm²

SML = specific migration limit in food or in food simulant

QMA = max. permitted quantity in the finished material or article expressed as mg per 6 dm² of the surface in contact with foodstuffs.

Dual-use additives

Substances that are restricted in food (dual use additives)	Additives may be contained which are simultaneously authorised as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1331/2008 (so-called dual-use additives). Further information is subject to confidentiality and can be requested from the manufacturer
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Substances not intentionally added (NIAS), impurities

As part of the assessment, a screening analysis was carried out using GCMS, which identified the following impurities or side reaction and degradation products (NIAS) for the SustaPVDF®FG natural colored.

Compound	Basis for the evaluation	Limitation
Di-(2ethylhexyl)-terephthalat	VO (EU) Nr. 10/2011	SML: 60 mg/Kg SML(T): 60 mg/Kg

Use of a functional barrier

Use of a functional barrier acc. Regulation (EU) No 10/2011 Article 3	none
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Conclusion

The quality SustaPVDF®FG natural colored can be safely used for the manufacture of finished products for companies which are preparing and processing foodstuffs.

Final products manufactured with SustaPVDF®FG natural colored may come into direct contact with all types of food at room temperature or below for up to 30 days and at temperatures of $70\text{ °C} \leq T \leq 100\text{ °C}$ for $t = 120 / 2^{(T-70)} / 10$ minutes.

The permissible ratio between plastic surface and amount of food is up to 6 dm²/kg for single and repeated contact with foodstuffs.

It is important to ensure that the above-mentioned contact times and temperatures as well as the maximum permissible surface food ratio are not exceeded.

* Note:

The declaration serves as a supporting document for the downstream user. Our semi-finished materials or cuttings from these semi-finished materials are products from intermediate stages of production in accordance with Regulation (EU) 10/2011 Article 15) and are not finished consumer goods in the sense of the Bedarfsgegenständeverordnung (§ 2) and the Lebensmittel- und Futtermittelgesetzbuchs (§ 2 Abs. 6 Satz 1 Nr. 1), as well as Regulation EC/1935/2004, Article 1, Para. 2.

The material is basically suitable for use in contact with food under the above-mentioned conditions. However, proper further processing and proper use are the responsibility of the user or the end user of the material, as these steps are beyond our control. This also includes further obligations according to Regulation (EU) 10/2011 for the downstream processing stage.

To prove that the described material may come into contact with foodstuffs, taking into account the appropriate use, we have solely carried out tests on the semi-finished products, as we are not aware of the conditions of use of the finished articles. Manufacturers of finished articles are requested to arrange their own assessments at their stage.

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General Information

The formulas of the materials listed in the declarations of conformity have been subjected to extensive migration tests with different stimulants by an independent accredited institute in compliance with EU 10/2011. The tests were carried out on mechanically processed samples of our semi-finished products.

Furthermore, it has been assured that generally only such raw materials are used for the material where the appropriate verifications of suitability (supporting documents) have been provided by the raw material supplier or that can be disclosed to an approved third party (test institute/laboratory) by means of an agreement of confidentiality on the part of the raw material supplier.

It remains the responsibility of the customer to determine the suitability of the plastic articles produced from or with our products for their intended use or rather under the respective conditions of use (contact time, contact temperature for the respective type of foodstuff). In addition to the general suitability for use of the material (e.g. chemical resistance to the cleaning agent used), such responsibility also includes observation of the migration limits in the event the actual contact conditions exceed or deviate from the "intended food contact" laid down in our declaration of conformity.

The products mentioned, are not suitable for medical or dental applications.

Organoleptic Testing:

In the case of coloured grades (all materials not of natural colour), determination of colour fastness was carried out in accordance with the method for testing the colour fastness of articles intended to come into contact with foodstuffs that are made of coloured plastic and other polymers, 24th Communication on the testing of plastics: Bundesgesundheitsblatt 15, 285 (1972). 3% acetic acid, 10% ethanol and 95% ethanol as substitute for fat were used as test stimulants. Result: the colouring is colourfast when in contact with all test stimulants.

Organoleptic (odour, taste) tests were not carried out, as a representative selection of suitable test foodstuffs and their corresponding contact parameters (temperature/time) on our level of the process chain is practically impossible due to the virtually unlimited combination possibilities of foodstuffs and contact conditions.

The above-mentioned information is based on the current state of our knowledge (see date of issue or change in the footer) as well as external laboratory Report No. 5586/29; 15586-51; 15586/58 as well as COC 41491U15, 53660U20 as well as 56215U22; 15586/60 as well as COC 57401U22. These documents can be submitted to the control authorities on request.

It is the responsibility of the recipient/user of our products to ensure that all existing laws and regulations are observed. This declaration will be reassessed in the event of any changes in laws, regulations and directives, raw materials, formulas, processing procedures or the like.

On request of the customer our semi-finished products can be finished in our in-house cutting department. This declaration covers semi-finished products in the above-mentioned quality that can be cut to the desired size by means of sawing and / or planning (without the use of cooling lubricants).

Cooling lubricant is used during grinding. The impact of the cooling lubricant on the migration properties was not tested in our process stage; this should be taken into consideration in the downstream process step.

Liability claims against the issuer of this declaration of conformity related to damage of a material, immaterial or ideal nature and caused by the usage or non-usage of the information offered or by the usage of defective and/or incomplete information are excluded on principle.

* This confirmation expires after 24 months after the date of last modification or in case of regulatory changes. It is the responsibility of those to whom we supply our products to ensure that any proprietary rights and existing laws and legislation are observed. Therefore we urgently ask you in your own interest to regularly check the confirmations issued on our website with respect to modifications or changes. In the event of changes new declarations are published on our website www.roechling.com, the former certificates automatically become void earlier.

Röchling Industrial Lahnstein SE & Co. KG

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