

Food contact compliance statement

We, ITS bv, hereby declare that the product we deliver to your company referenced Freshcling LMF belonging to the ITS range, is produced under Quality and Hygiene certified Management System:

- Quality: ISO 9001:2000 by LLOYDS
- Hygiene: BRC/IoP Hygiene Standards including HACCP by LLOYDS

We declare that this plastic film fully complies with the E.U. legislation in force (regulation (EC) N°1935/2004, 2023/2006) concerning materials and articles intended to come into contact with food and in particular with the directive 2002/72/EC (and its amendments) relating to plastic materials and articles.

Freshcling LMF is a PVC factor 2 film tested September 2007 for overall migration and specific migration of DEHA into simulant D (i.e. olive oil, as specified in directive 85/572/EEC). The obtained migration values meet the limits set up in directive 2002/72/EC by using a reduction factor of 2.

On the basis of previous testing **Freshcling LMF** film for overall migration into simulant A, B and C (Distilled water, Acetic Acid 3 % and

Ethanol 10 %, as specified in directive 85/572/EEC) in October 2003, the results showed to be well below (max 0.8 mg/dm² compared to the limit of 10 mg/dm²) the overall migration limit without reduction factor.

On that basis testing in olive oil is considered worst case scenario - and therefore no new testing into simulant A, B, C has been performed on Freshcling LMF since October 2003.

The testing into all types of simulant has been done under the conditions of:

- A maximum contact time/temperature of 10 days/40degr.C (Directive 82/711/EEC with latest amendment 97/48/EC)
- A surface/volume ratio of 6 (expressed in dm²/kg or dm²/L)"

None of the monomers used (excepted VCM) in this film are subject to Specific Migration Limit (SML) according to the directive 2002/72/EC (and its amendments).

The **Freshcling LMF** complies with the specific migration limit of **polymeric plasticizer** (n° PM 76866, SML 30mg/kg) using the worst case calculation after a reduction factor of 2 (see annex n°1 attached).

The **Freshcling LMF** complies with the specific migration limit of **VCM** (10 ppb) using the worst case (see annex n°2 attached).

The **Freshcling LMF** complies with the specific migration limit of **ESBO** (n° PM 88640). SML for ESBO is 60 mg/kg or 10 mg/dm² and overall migration of the film is below. Then SML of ESBO will always be below 10 mg/dm². More over, in referring to the food contact certificates provided by our suppliers, we are confident that the specifications (Oxirane < 8% and iodine number <6), when leaving our plant, will be below the maximum limit.

Concerning dual additives, on best of our knowledge, based on our supplier's declaration, Freshcling LMF film is not concerned by dual additives.

Freshcling LMF is a PVC factor 2 film tested for overall and specific migration under the conditions of 10 days at 40 degr.C. According to directive 97/48/EC, Chapter II §2.2 and §4.3 these testing conditions are conventionally considered more severe than testing for 2 hours at 70 degr.C (which is the normal test for "hot fill", i.e. actual use in "periods of less than 15 minutes at temperature between 70 and 100 degr. C").

Therefore the Freshcling LMF film is intended for food contact application covered by the following time/temperature combinations:

A: Up to 40 degr.C / > 24 hours

B: Up to 70 degr.C / max 2 hours

C: 70-100 degr.C / max 15 minutes ("hot fill")"

Food contact compliance statement

This PVC film is suitable for wrapping a broad variety of fatty foodstuffs (factor 2) and all other types of foodstuffs:

Margarine and butter

Cheese

Meat

Fish

Fruit, vegetable and Frozen product

Sandwich

Micro-wave oven

For defrosting, re-heating, cooking without contact with foodstuff

Freezer (-30°C mini)

This film is **not** suitable for:

Pure fat and oil, food preserved in an oily medium

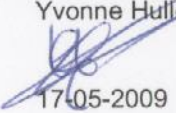
Traditional oven, infrared oven and multi purpose oven

The recipient should pay particular attention to any change in the packaged product, its intended use and also to any modification in the material's processing conditions and make sure that the contents and packaging are compatible, as directed in this declaration.

This certificate is only valid when the film is used in normal and foreseeable conditions, provided that the handling and storage conditions are also appropriate for preservation of the material's specific characteristics.

Quality department

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ANNEX n°1

DEMONSTRATION OF THE COMPLIANCE WITH THE SML OF POLYMERIC PLASTICIZER (n° PM 76866)

The worst case can be described as follows:

- Freshcling LMF are made with 5% max. of Polymeric Plasticizer (i.e. $C_{max} = 5\% = 50000\text{ppm} = 50000\text{mg/Kg}$)
- Freshcling LMF maximum thickness : 9 microns or 0.00009 dm
- All of the Polymeric plasticizer contained in the film totally migrates in the food

Given that:

- 1 kg of food is wrapped by 6 dm² of film (2002/72/EC Directive)
- Freshcling density : 1.25 g/cm³ or 1.25 kg/dm³
- Polymeric plasticizer SML = 30mg/kg (2002/72/CE)

Calculation of the maximum quantity of Polymeric Plasticizer that could migrate in 1 kg of food:

$$\begin{aligned} C_{max} \text{ in 1 kg food} &= C_{max} \text{ in film} \times \text{Mass of 6dm}^2 \text{ of film} \\ &= 50000 \text{ mg/kg} \times \text{Mass of 6 dm}^2 \text{ of film} \\ &= 50000 \text{ mg/kg} \times 6 \text{ dm}^2 \times \text{Film thickness} \times \text{Film Density} \\ &= 50000 \text{ mg/kg} \times 6 \text{ dm}^2 \times \text{Film thickness} \times 1.25 \text{ kg/dm}^3 \\ &= 50000 \text{ mg/kg} \times 6 \text{ dm}^2 \times 0.00009 \text{ dm} \times 1.25 \\ &= 33.7 \text{ mg/kg of food} \end{aligned}$$

But there is a reduction factor of 2, it means:

$$C_{max} \text{ in 1 kg food} = 16.9\text{mg/kg} < 30\text{mg/kg of food (SML)}$$

ANNEX n°2

DEMONSTRATION OF THE COMPLIANCE WITH THE SML OF VCM

We, ITS bv, hereby declare that this PVC cling film referenced **Freshcling LMF**, fully complies with the E.U. directives 78/142/EC, 80/766/EC and 81/432/EC relating to materials and articles which contain vinyl chloride monomer and are intended to come into contact with foodstuffs.

This film is suitable for wrapping foodstuff under normal or foreseeable use conditions, provided the conditions of storage, handling and use appropriate for a good preservation of their characteristics are respected. Referring to European's legislations all ingredients entering its composition are approved for food contact and are harmless for human health.

VCM (vinyl chloride monomer) in PVC film is very low or not detectable, in any case far below the EU limit of 1 PPM (or 1 mg/kg of finished product). This is proved by our PVC suppliers which certify us that VCM in PVC resin we use is below 1 PPM. As we use a maximum of 80 % of PVC resin in our PVC cling film, this limit in theoretical is 0.8 PPM. In practice, with the extrusion process, the level of VCM in PVC film is even far below (volatile is escaped) or undetectable (results are often under the detectable limit which is 0.2 PPM).

The worst case can be described as follows:

- Freshcling LMF is made with 100% PVC (i.e. Cmax of VCM in PVC = 1ppm)
- Freshcling LMF maximum thickness: 10 microns or 0.00010dm
- All of the VCM contained in the film totally migrates in the food

Given that:

- 1 kg of food is wrapped by 6dm² of film (2002/72/EC Directive)
- Freshcling LMF density: 1,25g/cm³ or 1,25kg/dm³
- VCM SML = 10 ppb (cf. 2002/72/CE)

Calculation of the maximum quantity of VCM that could migrate in 1 kg of food:

- Cmax of VCM in 1kg of food = Cmax in film x Mass of 6dm² of film
= 1ppm x 6 dm² x Maximum Film thickness of Freshcling LMF x FilmDensity
= 1ppm x 6 dm² x 0.00010 dm x 1.25 kg/dm³
= 1ppm x 6 dm² X 125mg/dm²
= 1ppm x 750mg
= 0,00075mg or 0,00075mg/Kg of food
= 0,75ppb

It means: **Cmax in 1kg food = 0, 75 ppb < 10 ppb (SML)**