

## Food contact compliance statement Freshcling-film

We, ITS bv, hereby declare that the product we deliver to **AVA Papierwaren NV** referenced

| ARTIKELNR | OMSCHRIJVING                              | Ref. leverancier |
|-----------|-------------------------------------------|------------------|
| 00465401  | FRESHCLING IN VRAC 300m x 30cm 9µ 3rollen | M290300110300    |
| 00465403  | FRESHCLING IN VRAC 300m x 45cm 9µ 3rollen | M440300110300    |

is produced under Quality and Hygiene certified Management System:

- Quality: **ISO 9001** by LRQA
- Hygiene: **BRC Packaging** Hygiene Standards including HACCP by LRQA
- Environment: **ISO 14001** by LRQA

1. We confirm that this product fulfills the requirements on materials used for articles or component of articles intended to come into contact with food as described in the following European and Dutch legislation:

- Framework Regulation (EC) N°1935/2004
- G.M.P Regulation (EC) N°2023/2006
- Regulation (EU) N°10/2011 (up to and including the amendment 2026/245)
- Dutch Regulation Verpakkingen- en Gebruiksartikelen (Warenwet)
- Reach EC1907-2006 and amendments.
- Regulation 2025/40 (EU) on Packaging and Packaging Waste

1a. This film does not contain no SVHC substances neither in article nor in packing materials

2. Additive(s) and/or monomer(s) are listed in the positive list of regulation (EU) N°10/2011 and amendment

3. NIAS: Potential Nonintentional Added Substances are undergoing risk assessment using recognized method.

4. Substance(s) with Specific Migration Limit:

The above film could contain an additive or a monomer that has specific migration limit restriction. In referring to the food contact certificates provided by our suppliers, we are confident that the total additives level in this film is below the limit (we check that this/these substance(s) meet(s) the limits by worst case calculation or with the help of migration tests).

| Monomer / Additive                        | PM Ref | Specific Migration limit(s) (ppm) |
|-------------------------------------------|--------|-----------------------------------|
| 1,4-dihydroxybenzene                      | 48620  | 0.600                             |
| Acetic acid, vinyl ester                  | 10120  | 12.000                            |
| DEHA, di-ethylhexyl adipate               | 31920  | 18.000                            |
| ESBO, epoxidised soybean oil              | 88640  | 60.000                            |
| Formaldehyde-1-naphthol, copolymer        | 54930  | 0.050                             |
| Iron                                      | FE     | 48.000                            |
| Terephthalic acid, bis(2-ethylhexyl)ester | 92200  | 60.000                            |
| VCM, vinyl chloride monomer               | 26050  | 0.010                             |
| Zinc                                      | ZN     | 5.000                             |

5. The overall migration and specific migration limits, after a factor 2, have been checked on the finished articles representing the worst-case reference of the family range of products ( higher thickness) according to regulation (EU) N° 10/2011 under the following conditions:

- A maximum contact time/temperature of 10 days / 40°C
- Food simulant: Ethanol 10% (A), Acetic acid 3% (B) and Vegetable oil (D2)
- A Surface/Volume ratio of 6 (expressed in dm<sup>2</sup>/kg or dm<sup>2</sup>/L)

6. Therefore, this film complies with the following application:

- Any long-term storage at room temperature or below:
- Including heating up to 70°C for up to 2 hours or heating up to 100°C for up to 15 minutes.

|                       |               |
|-----------------------|---------------|
| <b>Proceseigenaar</b> | Senior Buyer  |
| <b>Eigenaar</b>       | Harmen Bremer |
| <b>Nummer</b>         |               |
| <b>Versie</b>         | 31 (Actueel)  |
|                       | Harmen Bremer |
| <b>Vervaldatum</b>    | 8 jun. 2027   |

## 7. Dual use additives

To the best of our knowledge based on supplier's declaration and /or confidentiality requirements, this product contains:

| Dual used additive                               | PM Ref | E number | SM maxi (mg/kg food) |
|--------------------------------------------------|--------|----------|----------------------|
| Acetylated mono- and diglycerides of fatty acids | 30401  | E472A    | 13.92                |
| Glyceryl triacetate                              | 56360  | E1518    | 0.4176               |
| Sodium hydrogen carbonate                        | 42500  | E500     | 0.0433               |

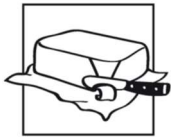
8. We have implemented a traceability system as requested from Art. 17 Regulation (EC) N°1935/2004 via the number on the box/number on core in conjunction with the date of production.

9. We hereby confirm that we do not use intentionally for the production of our films:

- Phthalates
- BADGE, NODGE & BFDGE
- BPA (Bisphenol A)
- Nanoparticles

9a. We declare that we do not use the following substance(s) as raw materials or processing aids for the production of our films)

10. The above film is suitable for wrapping foodstuffs as examples described below:



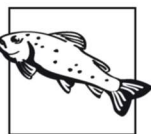
Margarine and butter



Cheese



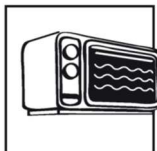
Meat



Fish



Fruit, vegetable and frozen product



Micro-wave oven

For defrosting and reheating.

Avoid direct contact with food.

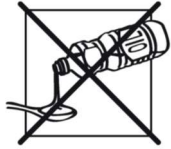
Migration tests carried out in distilled water at 100°C for 1 hour.



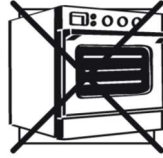
Freezer (subject to individual trials)

|                       |               |
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This film is **not** suitable for:



*Pure fat and oil, food  
preserved in an oily medium*



*Traditional oven, infrared oven and multipurpose oven*

## 11. Labeling

### Rules on labeling:

This product is labeled "for food contact".

or

This product bears the glass-fork symbol as illustrated below:



## 11. Warehouse rules:

*Optimal storage conditions: 15/20°C away from humidity. Film properties may be altered in extreme storage conditions.*

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.

**12.** The present declaration is valid 3 years after the date of its issue provided no new regulation comes in force and no modification of the product likely to modify the specifications is made during that period.

Apeldoorn, 1-7-2026



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