vacmet India Ltd

DECLARATION OF COMPLIANCE

Date of issue: 1st March'2024

This is to certify that **Biaxially Oriented Poly Propylene Film** of following types manufactured and supplied by **Vacmet India Limited,** comply with food contact regulatory requirements as per EEC Directives and FDA Regulations.

A) Heat sealable BOPP Films

S. N.	BOPP Film type	S. N.	BOPP Film type	S. N.	BOPP Film type
1	S2LS/S2LC/S2LC-S/S2ULS/S2UULS	6	SMM/LSMM/LSAMM/ /LCSMM	11	S2WP/S2WPLS/S2WPL/S2WPLT
2	S2G/S2G-AS/S2GT/S2G-UHS	7	SBMM/SHBMM/SHBMM-W	12	S2WPLT-TTK/SWP-LD
3	S2GOW/S2HSO/S2GCBW/S2GEP	8	SUHBMM/SUHBMM-A	13	S2W/S2WLS/S2WHLT/S2WOW
4	S1G/S1ULS/S1UULS/S2UULS	9	ULSMM/UULSMM/UULSMM-W / ULSMM-I/ SMMC	14	SWPMM/SWPLMM
5	S2AF//PGEL/PGEL-P	10	S2MA/MATL/S2MALS	15	S2WPUULS

Table- A

B) Non Heat Sealable BOPP Film

S. N.	BOPP Film type	S. N.	BOPP Film type	S. N.	BOPP Film type
1	PPL/PPC/PPC-TR/PPCTR-A/PPC-A	6	PSMM/PDMM-I/ PSMM-A	11	PAB
2	PGLB/PGBT/PGAT/PGAT-HT	7	PSM/PDM/PSHM Holo	12	PGAT-S
3	PGWP	8	MMLB	13	PCSR
4	PLMA/PLMA-05AS/PLMA-AS / PLMB/PLMA-P/	9	PUHBMM/PUHBMM-A/PPC-OA	14	PSMM-B
5	SWP-GP/ SWP-MI/SWP-MP	10	ECO-PGBT	15	PGEL/PGEL-E

Table –B

Film types listed above comply with following regulations.

A. EU Regulation 10/2011 and its successive amendments **EU 2020/1245 as on date.**

B. Frame work Regulation EC 1935/2004 and its amendment regulation 596/2009.

C. Regulation 2023/2006/EC, American 21 CFR 174.5 (GMP for food contact materials and articles intended to come in to contact with food)

D. U.S. FDA 21 CFR

21 CFR 177.1520 (C) 1.1a Polyolefin, 21 CFR 176.170, 21 CFR 178.3130, 21 CFR 178.2010.

21 CFR 175.300 Resinous and polymeric coating - Not Applicable

- FDA 21 CFR 177.1520(c)1.1. a. permitted by FDA for use in food-contact applications for food types identified in categories I to IX of table 1 under conditions of use A to H of table 2 in Title 21 CFR part 176.170 (c).

- All polymers & additives in the composition of above mentioned VACOPP products, fulfil the requirement of relevant regulations for use in plastic material and articles intended to come in contact with food.

- Above mentioned VACOPP products complies with commission regulation (EU) No. 10/2011 and its successive amendments as on date.
- Commission Regulation (EU) 2018/831 of 5 June 2018, amending Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.

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- Commission Regulation (EU) 2019/37 of 10 January 2019, amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.

- **Latest amendment Regulation (EU) 2020/1245 of 2 September 2020, amending and correcting Regulation (EU) No 10/2011** on plastic materials and articles intended to come into contact with food.

- Above mentioned VACOPP grades comply with **traceability requirement** set out in Article 17 of regulation EC 1935/2004 and all rolls carry the roll numbers mentioned on the roll labels supplied with our film rolls. In order to trace back any of these VACOPP grades of films used by the organization properly.

- EC Directive 2004/1 prohibits the use of azodicarbonamide as blowing agent from 2 August, 2005. Above mentioned VACOPP grades comply with these directives as azodicarbonamide is not used in their manufacture during any stage of production.

- Above mentioned products are not classified as hazardous according to the Regulation (EC) No.1272/2008 of the European Parliament and of the Counsel (CLP).

- Above mentioned VACOPP grades do not contain epoxy derivatives as under and hence in compliance to Directives 1895/2005/EC amended to Directives 2002/16/EC followed by 2004/13/CE.

- Bisphenol A Di-Glycedyl Ether 9BADGE)
- 2,3 Dihydroxy propyl ether BADGE.H20)
- 3-chloro-2-hydroxypropyl glycidyl (BADGE.HCL)
- (3-chloro-2-hydroxypropyl) - (2,3-dihydroxypropyl) ether {BADGE.H20.HCL}
- 3-chloro-2-hydroxypropyl ether (BADGE.2HCL)
- Bis (4-hydroxyphenyl) methane (**"BFDGE"**),
- Novolac glycidyl ethers ("NOGE")

- **Extractive Substances for Olefin Polymers**

Test Method: **FDA 21 CFR 177.1520(d)**

Limit : **FDA 21 CFR 177.1520©**

Test condition & Simulants solvents

Food Simulant	Test Condition	Unit	Result	Reporting limit	Limit
n-Hexane	2 hour(s) / boiling under reflux	%	1.44	0.1%	6.4
Xylene	2 hour(s) / boiling under reflux	%	5.32	0.1%	9.8

Category	Unit	Description	Maximum extractable factor in	
			n-Hexane	Xylene
1.	%	Polypropylene	6.4	9.8

Commission Regulation 2023/1442 of 11 July, 2023, amending Annex I to Regulation EU 10/2011 on plastic materials & articles intended to come into contact with food, as regards change to substance authorizations & addition of new substances.

Directive 2005/84/EC amending Directive 76/769/EEC which puts regulation on use of phthalates. Based on results obtained from specific migration test and declaration of raw material supplier**, we confirm that Phthalates mentioned below are not**

added at any stage of production by us or in Additive by suppliers. Film samples were tested and result found is mentioned below.

Food simulants and test conditions by 82/711, 85/572 EEC and its amendments.

Food Simulant	Test Duration / Temperature
95% Ethanol	10 days / 60°C

Following are the results:

S. No.	Restricted Substances	CAS Number	Result (mg/kg)	Detection Limit (mg/kg)	Limit (mg/kg)
1	Benzyl-Butyl Phthalate (BBP)	85-68-7	<0.3	0.3	6
2	Di-Ethyl Hexyl Phthalate (DEHP)	117-81-7	<0.3	0.3	0.6
3	Di-Butyl Phthalates (DBP)	84-74-2	<0.1	0.1	0.12
4	Di-iso Butyl Phthalates (DIBP)	84-69-5	<0.1	0.1	-
	Sum (BBP x 0.1 + DEHP x 1 + DBP x 5 + DIBP x 4)	-	<0.5	0.5	0.6
5	Di-iso nonyl Phthalate (DINP)	28553-12-0 68515-48-0	<1.5	1.5	-
6	Di-iso Decyl Phthalate (DIDP)	26761-40-0 68515-49-1	<1.5	1.5	-
	Sum (DINP +DIDP)	-	<1.5	1.5	1.8
7	Phthalic Acid, diallyl Ester (DAP)	131-17-9	0.01	0.01	N.D. (0.01)

Based on above test result, we confirm that VACOPP Range of products confirm to the requirement of regulation EU 2023/1442.

A new reduction Factor should be introduced in migration testing (FRF) for **Lipophilic** substances. The VACOPP grades do not contain any substances falling under list of lipophilic substances.

1. OVERALL MIGRATION LIMITS

Film types listed above are produced with monomers, the starting substances and additives listed in the Union List of Authorized Substances of 10/2011 and its successive amendment EU 2019/37.

All polymers and additives in the composition of above-mentioned films, appear in the positive list of products accepted for the production of packaging materials intended for food contact, as published by the **Food and Drug Administration (USA) FDA 21 CFR 177.1520(c)1.1a (Polyolefin)**

Films were tested according to latest directives (10/2011 and its successive amendment 2019/37) in the following simulant to obtain global migration values for all food types.

we have tested Global Migration of films at 40°C for 10 days and result found is within <2 mg/dm2 as mentioned below.

S. N.	Test Simulants	Test Condition	Result (mg//dm²)	Permissible Limit (mg/dm²)
1	3% Acetic Acid (W/V) Aqueous Solution	10 days/ 40°C	<2.0	10
2	10% Ethanol	10 days/ 40°C	<2.0	10
3	Olive Oil	10 days/ 40°C	<2.0	10
	Conclusion	--	**Pass**	--

2. Specific Migration of Bisphenol A:

VACOPP Film was tested as per the requirement of EN 13130-1:2004. Simulants used 3% Acetic Acid (W/V in aqueous solution), Test condition: 60ºC for 10 days.

Test Item	Unit	Result (1st Migration)	Permissible limit
Bisphenol A	mg/kg	<0.05	0.05
Bisphenol F	mg/kg	<0.05	0.05
Bisphenol S	mg/kg	<0.05	0.05
Conclusion	-	**Pass**	-

3. Specific migration of Primary Aromatic Amines

Testing conditions – Test conditions are chosen with reference to Directive 82/711/EEC, Council Directive 85/572/EEC and its corresponding regulations. Simulant: 3% Acetic acid, time 10 days at 60°C)

S.N.	Testing parameter	Result (mg/kg)-Component No.	Limit of quantification mg/kg	Compliance Requirement/ Limit Max (mg/kg)	Conclusion Pass/Fail
1.	Sum of Primary aromatic Amines	<0.01	0.001	<0.01	**Pass**

We further confirm that heavy metals such as Lead (Pb), Hexavalent Chromium (Cr VI), Cadmium (Cd), and Mercury (Hg) as such and their compounds are neither used in the manufacturing of VACOPP film nor they detected in the analysis with TPSH-ICP-OES. The sum of these possible contaminants is below 100 ppm and complies EU directive 2011/65/EU (RoHS II) and 2004/12/EC amending directive 94/62/EEC (Packaging and Packaging Waste) with the **CONEG Legislation USA as well as EN71**.

BOPP films are tested for contact with all types of food regarding Methods described in Annex III in Regulation 10/2011/EC (Table 1, List of food simulants). That means testing for 10 days at 40°C shall cover both long-term storage at room temperature and below as well as heating up to the described temperature and time.

We use following additives in our BOPP Films which are included in the union list of authorized monomers and other starting substances in Annex 1 of EC Directives 10/2011 and its successive amendment 2019/37. The same Simulants as for OML, B, D1, D2 are used for SML testing (10 days, 60°C) for all food types therefore SML testing with Tenax (Simulant E) for dry foods is not required at all.

During the production we use additives that are in conformity (regarding producer documents) to this Framework Regulation (1935/2004/EC) and Regulation 10/2011/EC with amendments, (Annex -I, Table 1). Also we declare that according our calculations (assuming that 1 kg. of food is packaged with 6 dm² of film) we do not exceed SM limits of the substances.

Chemical Name	PM Ref Number	SML
N-bis (2-hydroxyethyl) alkyl (C8-C18) amine	39090	1.2 mg/kg
Octadecyl 3-(3,5-di-tert-butyl-4-hydroxylphenyl) pro- pionate	68320	6 mg/kg
Tetrakis (2,4-di-tert-butyl-phenyl) -4-4'-biphenylylene diphosphonite	92560	18 mg/kg
Phthalic acid, dibutyl ester	74880	0,3mg/kg
Phthalic acid, bis (2-ethylhexyl) ester	74640	1.5mg/kg

4. DUAL USE ADDITIVES

Our films may contain following food additives.

Chemical Name	CAS or PM ref number	E Number
Mono/ diglyceride of fatty acid	PM/Ref: 56486	E471
Synthetic Silica	CAS No. 7631-86-9	E551

5. SPECIFIC MIGRATION OF HEAVY METALS

On September 3, 2020, the European Union (EU) published **Regulation (EU) 2020/1245** to amend and correct **Regulation (EU) 10/2011** on plastic materials and articles intended to come into contact with food ('Food Contact Plastics Regulation)
Regulation EU 10/2011 Annex II, imposes the limit for the use of heavy metals. It states that plastic materials and articles shall not release the following substances in quantities exceeding the specific migration limits below:

The raw material used in production of above VACOPP films such as Polypropylene, PP Copolymers/ Terpolymers and additive master batches do not contain any heavy metals such as cadmium, hexavalent chromium, lead, antimony, nickel, tin, arsenic, PBB, PBDE and mercury as declared by the suppliers of above-mentioned raw materials. We confirm that neither the said heavy metals nor their compounds are intentionally added during the production of the said BOPP Films nor they are used directly or indirectly in production process itself and any incidental amount of heavy metals contained does not exceed limit.

VACOPP Films were tested as per requirement of commission regulation **EU10/2011** and its amendments **(EU2020/1245).** The results have shown that VACOPP material conforms the requirements of all these regulations **(Testing conditions –Food Simulant: 3% Acetic acid, time 10 days at 60°C)**. Test results obtained are tabulated as under;

S.No.	Heavy Metal	Unit	Reporting Limit	Result (1st Migration)	Compliance Limit	Conclusion (Pass/Fail)
1	Aluminium	mg/kg	0.01	<0.1	1	Pass
2	Antimony	mg/kg	0.01	<0.01	0.04	Pass
3	Arsenic	mg/kg	0.01	<0.01	ND	Pass
4	Barium	mg/kg	0.1	<0.1	1	Pass
5	Cadmium	mg/kg	0.002	<0.002	ND	Pass
6	Total Chromium	mg/kg	0.01	<0.01	ND	Pass
7	Cobalt	mg/kg	0.01	<0.01	0.05	Pass
8	Copper	mg/kg	0.1	<0.1	5	Pass
9	Iron	mg/kg	1.0	<1.0	48	Pass
10	Lead	mg/kg	0.01	<0.01	ND	Pass
11	Lithium	mg/kg	0.1	<0.1	0.6	Pass
12	Manganese	mg/kg	0.1	<0.1	0.6	Pass
13	Mercury	mg/kg	0.01	<0.01	ND	Pass
14	Nickel	mg/kg	0.01	<0.01	0.02	Pass
15	Zinc	mg/kg	1.0	<1.0	5	Pass
16	Europium	mg/kg	0.01	<0.01	--	Pass
17	Gadolinium	mg/kg	0.01	<0.01	--	Pass
18	Lanthanum	mg/kg	0.01	<0.01	--	Pass
19	Terbium	mg/kg	0.01	<0.01	--	Pass
20	Sum of Lanthanide substances	mg/kg	0.01	<0.01	0.05	Pass
Overall Conclusion (Pass/Fail)				**Pass**		

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Statement regarding Mineral Oil (MOSH and MOAH):

On the basis of results obtained from testing of VACOPP Film for presence/absence of Mineral oil (MOSH and MOAH) in it, we declare that VACOPP Film supplied by Vacmet India Limited conforms to the Commission Recommendation (EU) 2017/84 of 16 January 2017. Following are the results obtained:

Determination	Time	Temperature	Results	UoM	LOQ	Limits	Method
MOSH on Tenax (MPPO)	10 days	40ºC	<0.2	mg/kg	0.2	2.0	004 MPP FCM041 REV 2 2016
MOSH (C20-C35)							
MOAH on Tenax (MPPO)	10 Days	40ºC	<0.2	mg/kg	0.2	0.5	004 MPP FCM041 REV 2 2016
MOAH (C16-C35)							

We also confirm that POSH (Polyolefin Saturated Hydrocarbons) and PAO (Poly Alpha Olefins) are not being added intentionally in the process of manufacturing of VACOPP Films.

6. REACH

Under the **REACH regulation**, all products of Vacmet are manufactured items obtained from polymers and so exempted from REACH registration.

Vacmet have taken all necessary steps to ensure that chemical components from which VACOPP products are obtained fulfill the obligation of the REACH registration with specific requests of declaration from Vacmet raw material suppliers.

Raw material suppliers of Vacmet are:

Producers of Polymers, Producers of polymer Master batches (add mixture of polymers and other components)

Polymers are exempted from the provision of registration of Title II REACH (Article 2 (9).

Polymer batches are considered in regulatory terms, preparations and are exempted from the provision of registration.

Nevertheless, the obligation of registration of the individual chemical substances used by the raw material suppliers to Vacmet goes down in the supply chain to obliged parties that supply the base chemicals and monomers (namely propylene monomer) to the producers of polymers and producers of polymer master batches that are the present suppliers of Vacmet.

SUBSTANCES OF VERY HIGH CONCERN (SVHC):

All VACOPP range of products conform SVHC screening test which is performed according to **240 Substances of Very High Concern** and do not contain in their composition more than 0.1% (w/w) concentration of the substances listed as per the authorization list and candidate list by ECHA. **(Last updated 23rd JAN 2024)-**published in accordance with Article 59(10) of the **REACH Regulation EC NO. 1907/2006).** The result of the said OPP films is well within the permissible limit 0.1% wt. /wt.

7. GMO –DIOXINE – ALLERGENS – RECYCLED RAW MATERIALS USAGE:

According to the declaration received from our RM suppliers, the Homopolymer, Copolymers/Terpolymers or additives used for the production of above films do not contain any genetically modified organisms.

1895/2005 EC related with dioxin and dioxin related PCB's in the food chain is not applicable to our products.

Our films do not contain any allergic substance and it is confirmed that our film complies with 2003/89EC.

8. RECYCLING

EN13428: Vacmet India Limited is continually working on reducing Grammage of the base film in order to reduce the net requirement of the base polymer.

EN13429: Majority of VACOPP Films are used in lamination process which once laminated cannot be re-used.

EN13430: All the bare film of VACOPP (BOPP Films) can be recycled before going into converting process.

9. German Food, Articles of daily use and feed code of September 1, 2005 (LFGB), Section 30, European Commission regulation (EU) No. 10/2011 and its amendments and **BfR recommendation.**

PP – Chromium, Vanadium, Zirconium and Hafnium content.

Test Item	Result (mg/kg)	Reporting limit (mg/kg)	Permissible limit (mg/kg)
Chromium (Cr)	ND	5	10
Vanadium (V)	ND	20	20
Zirconium (Zr)	ND	20	20
Hafnium (Hf)	ND	20	20
Comment	**Pass**	--	

Our films do not contain above substance and it is confirmed that our film complies with BfR requirements.

10. SENSORIAL EXAMIBNATION ODOUR AND TASTE TEST

S. N.	TASTE NAME	TEST ITEM	RESULT -1	MAX. PERMISSIBLE LIMIT
1	Sensorial examination odor (Point scale)	Whole product	1	2.5
2	Overall conclusion	--	Pass	--

- We hereby declare that above mentioned products do not contain any source of tin {Dibutyltin (DBT), Tributyltin (TBT), Monobutyltin (MBT), Alkyl tin or other organotin compounds} and not intentionally added during any stage of production.

- Directive 2002/61/EC of the European Parliament amending Directive 76/769/EEC relating to restrictions on the use of certain dangerous substances and preparations (Azocolourants which may release one or more aromatic amines). Based on the results obtained from the specific migration test and declaration from suppliers, we hereby confirm the non-presence of Aromatic amines in our above-mentioned film grades.

- Above mentioned VACOPP grades also comply with recoverability requirements set forth in Directives 75/442/EEC as amended by 91/156/EEC, 91/692/EEC & 96/350/EEC), 94/62/EEC, 1999/177/EC & 2001/524/EC. The recent amendments of 94/62/EC, 2004/12/EC, have no direct effect on the status of these VACOPP grades in this regard.

- **Perfluoroalkyl & Polyfluoroalkyl substances (PFAS)**: Directive 2006/122/EC of the European Parliament and of the Council of 12 December 2006 amending for the 30th time Council Directive 76/769/EEC on the approximation of the laws, regulations and administrative provisions of the Member States relating to restrictions on the marketing and use of certain dangerous substances and preparations. We confirm that Perfluoro Octanoic Acid (PFOA) and Perfluoro Octan sulphonate (PFOS) are neither part of the raw material nor used intentionally in our production process.
- Halogen substances (fluorinated substances, PFOS, PFOA, Chlorinated substances (Hydrocarbons, paraffin, PVC & Vinyl Chloride), Brominated Substances, Iodinated and Astatinate d substances) are not intentionally used in raw material at any stage of manufacturing of above-mentioned products.

- On May 27, 2020, Denmark published Order No. 681 of May 25, 2020 'Executive Order on Food Contact Materials and Penal Code for Violation of Related EU Acts' in its Official Gazette (Lovtidende A) to prohibit PFAS chemicals in food contact

paper and board materials and articles. Also refers to NL Legislation Netherlands: Commodities Act regulation packaging and consumer goods valid on 01-07-2022.

- Above mentioned VACOPP grade is not subject to labeling as a hazardous chemical or preparation according to 67/548/EEC and 1999/45/EC. These are not classified as hazardous to water according German regulation (no. "WGK"). The formulation contains no substances forbidden or restricted by chemical prohibition regulation 76/69/EC and it's amendments 2006/122/EC. As a waste it does not form materials that that require monitoring or special supervision as laid down in the "Act for promoting Closed Substance Cycle waste management and ensuring environmentally compatible waste disposal "and in the **Directives 91/689/EEC and 91/156/EEC**, i.e. it not hazardous waste.

- We also declare that **following substances are not used in the manufacturing or production of any of the above products.**

1. Titanium Acetyl Acetone
2. Acetyl acetone
3. Azo Colorants
4. Nonylphenols
5. Derivatives of Vegetal origin OGM
6. Aromatic Hydrocarbons
7. Epoxide Derivatives (BADGE-BFDGE-NODGE-BPA
8. Latex
9. Nichel
10. ITX
11. PFAS
12. PCB –PCT
13. Fungicides and fumigants
14. Adipates
15. Melamine
16. Animal Fats

- **Council Directive 78/142/EEC along with 80/766/EEC & 81/432/EEC** lays down limits for the quantity of Vinyl Chloride monomer and its derived polymer (PVC) present in the plastic material & articles intended to come into contact with foodstuffs. Above mentioned VACOPP grades comply with this regulation as Vinyl Chloride monomers and its derived polymer (PVC) are not added either as main constituent or as additives during any stage of film manufacturing.

- Directive 2003/118/EEC amending directive 86/362/EEC, 86/363/EEC & 76/895/EEC limits the maximum level of Pesticides like (Acephate,2,4, -D and Parathion methyl in the material intended to come into contact with food stuff. Based on our knowledge of the material and process none of these substances are present or intensely added during any stage of production, hence would not expect to be present.

- Directive 90/220/EEC put regulation over the deliberate release of genetically modified.
- During production of above-mentioned films, no allergic substances (Wheat, Crustaceans, Egg, Fish, Peanuts, Soybeans, Milk, Tree Nuts Mustard, Sesame, Lupin and their products thereof) for which a special food labeling is required by Directive 2003/13/EEC till amendment 2007/68/EEC are being used.
- Above mentioned grades of VACOPP are free Latex content as it is not used as main constituents or as additive in their manufacture during any stage of manufacture.

- **CALIFORNIA PROPOSITION 65. The Safe Drinking Water and Toxic Enforcement Act of 1986, latest updated on 11th August 2023** intended to protect California Citizens and the state's drinking water source from the chemical known as cancer, birth defects or other reproductive harms and to inform citizens about exposures to such chemicals. We declare that composition for the above mentioned **VACOPP grades** does not contain such chemicals and thus comply with above regulation.

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- The above mentioned VACOPP grades of packaging films are being produced under the **ISO 22000:2018 Food safety and Hygiene certifications** covering the good manufacturers practice –GMP Regulation (Under the provision of LFGB § 30 and §31, EC – regulation 2023/2006/EC as well as US FDA 21 CFR § 174.5 within a quality management system certified as per **ISO 9001:2015**) and HACCP (Hazard and Critical Control Points). The film manufacturing also complies with the requirement of ISO 14001- Environment Management System.

- **China Food Contact Materials and articles Regulation System:** To the best of our knowledge and understanding, it is declared that above grade of BOPP Films produced complying General Safety standards of china as per GB 9685-2016 and GB4806.1-2016. On the basis of results obtained for overall migration and Specific migration test as per guidelines of other regulations it is declared that above grade of BOPP Films complies with requirement of overall migration test and specific migration test as per Chinese Regulation GB 31604.1 -2015.
It is also declared that BOPP Films of above grades are manufactured as per general specification of production for food contact materials hence comply with GB31603-2015.

- **EU Regulation 2022/1616 dated 15th September 2022, repealing Directive EC 282 / 2008** on recycled material and articles intended to come into contact with food regulates the use of material produced from waste. As described in (point no. 6 & 7 page 1 of 282/2008), off cuts and scrapes from the production of plastic food contact material, that has not been in contact with food or otherwise contaminated and is re-melted on the premises into new product or sold to a third party as part of quality control system in compliance with rules for **good manufacturing practice** laid in regulation (EC) 2023/2006 would be considered as suitable for food contact application and should not fall under the scope of this regulation. We hereby declare that above mentioned grades do not contain any pre-consumer recycled material produced by chemical de-polymerization process hence complies with this regulation. VACOPP Films are produced only from virgin resin and do not contain post-consumer recycled components and therefore no obligation exists under the 2022/1616/EC.

- **COMMISSION REGULATION (EU) 2023/1627 of 10 August 2023** amending Annex I to Regulation (EU) No 10/2011, as per the information available with us and to the best of our knowledge, we declare that the substance bis (2-ethylhexyl) cyclohexane-1,4-dicarboxylate '(DEHCH', CAS No 84731- 70-4, FCM No 1079) is not being added intentionally at any stage of production of above VACOPP range of BOPP Films manufactured & supplied by **Vacmet India Limited**.

- **TSE- BSE free Declaration:** We confirm that above mentioned VACOPP range of BOPP Films manufactured by us are neither derived from animal or human origin nor manufactured utilizing intermediates and/ or auxiliary agents which are of animal or human origin. Above mentioned VACOPP products do not contain Bovine Spongiform Encephalitis **(BSE)** and Transmissible Spongiform Encephalitis **(TSE)**. Hence the issue of Animal Spongiform Encephalopathy does not arise. Therefore, our product is in accordance with the current revision of note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products (EMEA/410/01, rev.3). Above products do not contain Food Allergens, Azodicarbonamide and Genetically Modified Organisms.

- **Statement concerning non-intentionally added substances (NIAS):** VIL has established end-to-end control systems in all of its manufacturing process, from raw material receipt to finished product shipment, which guarantees that no intentionally added substances (NIAS) are formed or introduced in any of its manufacturing plants or finished products. Likewise, VIL's suppliers guarantee that any monomers and/or additives used during the manufacturing process of their products meet the criteria for the classification of substances and mixtures, in compliance with Regulation (EC) 1272/2008.

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- We do not test our film for the substances listed in Canadian Chemicals Management plan challenge list batches (Batch 1 to 12). Based on our current knowledge of raw material and process, we have no reason to expect that any of these substances would be present. However, we cannot exclude that the product may contain traces of substances as introduced from raw material for which we are currently not aware of and that do not allow us to guarantee completeness of information.
- On March 6, 2023**, the Ministry of Health, Labor and Welfare (MHLW) of Japan** released a revised draft of the **Positive List of Substances** Allowed for Food Contact Utensils, Containers and Packaging.
  We confirm that VACOPET range of products comply with requirements.

Notes for Information Purpose Only

This declaration is issued on basis of the tests carried out from external agency, results obtained thereof and RM supplier's declaration.

1. According to the EEC Directive / FDA Regulations, the Migration Limits has to be controlled on the finished articles intended to come in to contact with foodstuffs. Migration Tests on the final material or article will determine the regulatory suitability for contact with different food types and various end user applications.
2. Since the OPP films are being converted to laminates and subjected to printing and lamination using different adhesives, printing inks, over print varnishes and other substrates, this is the responsibility of the converter/user of the BOPP films to determine and satisfy the regulatory suitability for food contact compliance of converted BOPP films.
3. However, these are beyond the control of **Vacmet India Limited** and hence **Vacmet India Limited** makes no warranties, express or implied and has no liability in connection with the regulatory suitability for food contact compliance of converted BOPP films.
4. The raw material used for manufacturing of BOPP films are duly certified for regulatory suitability of food contact compliance for migration limit according to EEC Directives / FDA Regulations by concern raw material suppliers.
5. The statements given above are based on current level of information and knowledge, which covers BOPP Films supplied by Vacmet India Limited. However, the customer must make their own determination and analysis that uses our product is

safe, lawful and technically suitable in their intended use. Since the conditions of use is beyond our control, Vacmet India Limited makes no warranties, express or implied and assume no liability with any use of this information.

Responsibilities

By following the above-mentioned regulations, we have fulfilled our duty of care regarding the conformance of the film we supply with legislation governing food contact applications. It is the responsibility of the user to test the suitability of our products for the intended application. We accept no liability for losses arising from inadequate suitability of our products for the food medium being used by the end user.

S R TRIPATHI

Pritam Singh Padiyar

Vacmet India Limited
Dated 1st Mar, 2024.
Anant Plaza 4/117-2A, Civil Lines, Church Road, AGRA -282 002