

## Declaration of Compliance A-PET/PE sheet For thermoformed food contact articles

This A-PET/PE sheet supplied by SKY-LIGHT A/S is intended to come into contact with the indicated foodstuffs and comply with the following EU Commission regulations and directives:

- Regulation (EC) No. 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with food incl. the Danish Bekendtgørelse om fødevarekontaktmaterialer nr. 822 af 26/06/2013.
- Commission Regulation (EU) No. 10/2011 of 14 January 2011 with amendments (EU) 2018/213 (EU), 2018/831, (EU) 2018/79, (EU) 2017/752, (EU) 1416/2016, (EU) 2015/174, (EU) 202/2014, (EU) 1183/2012, (EU) 1282/2011 and (EU) 321/2011 on plastic materials and articles intended to come into contact with food, also known as "PIM" – "Plastics Implementing Measures".
- Commission Regulation (EC) No. 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods.
- Commission Regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.
- Council Directive 94/62/EC of 20 December 1994 with amendments 2005/20/EC and 2004/12/EC on packaging and packaging waste incl. the Danish Bekendtgørelse om visse krav til emballager nr. 1455 af 07/12/2015.
- Framework Resolution ResAP(2004)1 of 1 December 2004 on coatings intended to come into contact with foodstuffs. (Only applies A-PET sheet coated with bath treatment).

### Field of application:

A-PET/PE sheet is recommended for contact with foodstuffs under the following conditions:

Description:		Intended for:	
A-PET/PE	SKY600	Aqueous foods	Yes
		Acidic foods	Yes
Storage and filling treatment:		Alcoholic foods	Yes
<ul style="list-style-type: none"><li>• Unlimited storage treatment at cooling and freezing temperature.</li><li>• Hot Fill up to 70° C for max. 2 hours.</li><li>• Unlimited storage treatment at room temperature.</li></ul>		Fatty foods	Yes
		Dry foods	Yes
		Dairy foods	Yes
		The closer to the limits the more the mechanical properties of A-PET are influenced by temperature and humidity.	
Use in microwave oven	No		
Freezing	Yes		

At temperatures above 60° – 70° C the mechanical stability of the final product has to be assessed.

### Sheet structure:

A-PET sheet is designed as a 3-layer film, where recycled material is extruded into the middle layer. The outer layers function as a functional barrier. One outer A-PET layer is laminated with a PE layer.

### Food contact legislation:

We declare that the raw materials used in the manufacturing of this A-PET/PE sheet comply with the requirements regarding its composition to (EC) No. 1935/2004 and (EU) No. 10/2011, specifying the following migration limits. For the evaluation an area/volume ratio of 6 dm<sup>2</sup>/1 kg foodstuff was taken into account.

## Overall migration (OML):

As laid down in Regulation (EU) No. 10/2011, plastic materials in contact with foodstuff are subject to an Overall Migration Limit (OML) of 10 mg/dm<sup>2</sup>.

## Results:

An A-PET/PE sample was tested for overall migration by the Eurofins Laborservices GmbH, Labor ILWA in Nürnberg, accreditation no. 168, 222 and 522, based on the international standard DIN/EN ISO/IEC 17025, using the total immersion procedure essential to EN 1186 (1 dm<sup>2</sup> sample to 100 ml. simulant).

Food simulant:	Test conditions (time/temperature):	Overall migration (mg/dm <sup>2</sup> ):
10 % ethanol (A)	10 days 60°C	< 1 mg/dm <sup>2</sup>
3% acetic acid (B)	10 days 60°C	< 1 mg/dm <sup>2</sup>
Olive oil (D2)	10 days 60°C	< 3,7 mg/dm <sup>2</sup>

All results are well below 10 mg/dm<sup>2</sup> and therefore in compliance with the OML requirements.

## Specific migration (SML):

A-PET/PE sheet contains the following listed substances and additives which are regulated by Commission Regulation (EU) No. 10/2011.

## Specific migration testing APET:

CAS no.:	Substance:	Food simulant:	Test conditions	Restriction limit (mg/kg):	Result (mg/kg):
107-21-1	Ethylenglycol		Screening	30 mg/kg	< 18 mg/kg
111-46-6	Diethylenglycol		Screening	30 mg/kg	< 18 mg/kg
100-21-0	Terephthalic acid		Screening	7.5 mg/kg	< 0,7 mg/kg
121-91-5	Isophthalic acid		Screening	5.0 mg/kg	< 0,5 mg/kg
1309-64-4	Antimony		Screening	0.04 mg/kg	ND*
	Sulphonic Acid*	50% Ethanol	10 days 60°C	6.0 mg/kg	1.59 mg/kg

\*ND: Not detected.

\*Sulphonic Acid is an active substance in the additive used only for bath treated sheet.

The above listed restricted substances are complete to the extent that accurate information was received from our raw material suppliers.

The restrictions have been tested by above mentioned 3<sup>rd</sup> party laboratory. They were proved not to be exceeded either by migration testing, screenings, or by worst case calculation. For the evaluation, an area/volume ratio of 6 dm<sup>2</sup>/1 kg foodstuff was taken into account.

## PE film:

The following results of specific migration from PE film are obtained by an overall migration tests made by sub suppliers and from these results, it has been calculated whether the specific migration values are in compliance with the legislative requirements.

CAS no.:	Ref. no.:	Substance:	Restriction limit (mg/kg):	SML information:
75-38-7	26140	Vinylidene fluoride	SML = 5 mg/kg	Complies
2082-79-3	68320	Octadecyl 3 (3,5-di-tert-butyl-4-hydroxyphenyl) propionate	SML = 6 mg/kg	Complies
57-11-4	89040	Zinc stearate / Stearic acid	SML (T) = 25 mg/kg (zinc)	Complies
592-41-6	18820	1-Hexene	SML = 3 mg/kg	Complies
108-05-4	10120	Acetic acid, vinyl ester	SML = 12 mg/kg	Complies

The specified migration results are below the limits and the migration limits will not be exceeded under the test conditions 10 days at 60 °C in the 3 standard food simulants (A-B-D2).

## Dual-Use Additives:

As required in Commission Regulation (EU) No. 10/2011, the following table identifies the substances used in the manufacturing of PE. This information received from our suppliers, can only be considered preliminary:

Ref. no.:	Substance:	CAS no.:
E551	Silicium dioxide	007631-86-9
E553b	Talc	0014807-96-6
E559	Aluminium siicate	0012141-46-7
E321	2,6 di-tert-butyl-p-cresol (BHT)	0000128-37-0

The above listed restricted substances and dual-use substances are complete to the extent that accurate information was received from our raw material suppliers.

**Please notice that it is the responsibility of the manufacturer of the finished food contact article to ensure that the packaging complies with the migration requirements.**

## Heavy metal:

We declare that all raw materials used in the manufacturing of SKY 600 A-PET/PE sheet do not have a concentration of lead, cadmium, hexavalent chromium and mercury that exceeds 100 PPM, and conform to Council Directive 94/62/EC with amendments 2005/20/EC and 2004/12/EC.

## Food contact status colorants:

This declaration of compliance also covers APET/PE sheet with colorants. Colour concentrates used in the colouring of A-PET sheet complies to the following: European Resolution AP(89)1 on the use of colorants in plastic materials coming into contact with food. Directive 94/62/EC of 20.12.1994 and amendments. BfR Empfehlung IX on colorants used for colouring plastic materials coming into food contact.

Colour concentrate is extruded into the middle layer of the sheet and will therefore not be in direct contact with the foodstuffs. White A-PET contains the dual-use additive Titanium Dioxide TiO<sub>2</sub> E171.

## Chemical substances:

Substances such as 4-methylbenzophenone, benzophenone, hydroxybenzophenone and bisphenol A are not added or used in the manufacturing of SKY 600 A-PET/PE sheet and are therefore not expected to be present in our products.

**Impact of smell, taste and colour:**

According to article 3 in Regulation (EC) No. 1935/2004 and to § 31 of the German “Lebensmittel- und Futtermittelgesetzbuch” (LFGB), materials and articles in contact with food have to be such manufactured, that under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities, which may cause a deterioration of the food organoleptic characteristics.

The manufacturing of A-PET/PE sheet complies with the food regulatory requirements with respect to its sensory properties under the applied conditions and can be used as packaging material for all types of food.

**Storage conditions and shelf life:**

The material has to be kept in its original packaging in a cool or temperate and dry place. Avoid direct exposure to sunlight and UV light. It's recommended to use the sheet within the first 24 months after the production date.

SKY-LIGHT A/S is not aware of the limits of shelf life.

**Registration:**

SKY-LIGHT A/S is registered by the local food authority, “Fødevareregion Esbjerg”, under the following production number: P 100 166 73 93.

SKY-LIGHT A/S is registered by EFSA – “European Food Safety Authority” for the approval of our recycling process of recycled plastic material under the following registration numbers:

Mandate No.: M-2009-0173.

Recycling process No.: RECYC005.

EFSA application No.: EFSA-Q-2009-00707/efsa/cef/fcm/1444.

SKY-LIGHT A/S is a B-member of SEDEX Global under the following member number: S55894.

**Remark:**

This Declaration of Compliance is applicable to current and future supplies of A-PET/PE and is updated only by:

- Legislative changes.
- Creation of new scientific data that affects the use of the material.
- Modified composition of the material or the article that has significance for the application.

Authorised signature:



E-Manager Michael Kristensen [mk@sky-light.dk](mailto:mk@sky-light.dk)

Company: SKY-LIGHT A/S, Tømrervej 36, DK-6800 Varde, Denmark.