Taastrup, 25th July 2018

Certificate of compliance – EU food legislation

This certificate is valid for the following products:

⇨ **SEE OVERVIEW IN APPENDIX**

RPC Superfos hereby warrants that all products delivered are in accordance with the data sheet for the product provided and suitable for food applications.

Compliance:
RPC Superfos further warrants that the products comply with the European Union Commission legislation listed below, all with amendments:

- Regulation EC No. 1935/2004 on materials and articles intended to come into contact with food
- Regulation EU No. 10/2011: "Plastic materials and articles intended to come into contact with food".
- Regulation 2023/2006 on rules of Good Manufacturing Practice
- Directive 94/62 on packaging and packaging waste

– together the "Applicable EU Legislation"

Migration Limits:
The overall migration testing is performed according to method EN1186, specific migration testing is performed according to EN13130 and the surface/volume ratio used for those tests is 20 dm^2 per 1 L of food simulant.

Overall Migration:
The compliance is verified by Overall migration testing at an external accredited laboratory under the following conditions:

Simulants	Test conditions
3 % acetic acid	30 minutes at 90°C followed by 10 days at 40°C
50% ethanol	30 minutes at 80°C followed by 10 days at 40°C
Olive oil	30 minutes at 90°C followed by 10 days at 40°C

Results of overall migration comply with 10mg/dm^2 limit as it is stipulated in EC 10/2011.

Specific Migration:
Specific migration tests are performed under the following conditions:

Simulants	Test conditions
3 % acetic acid	30 minutes at 90°C followed by 10 days at 60°C
Olive oil	30 minutes at 90°C followed by 10 days at 60°C
Isooctane	30 minutes at 60°C followed by 2 days at 30°C
95% ethanol	10 days at 60°C

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The following substances for which restrictions/specifications are in place (SML) maybe used in the production of the listed products and they all comply with established limits:

Substance:	SML limits:
Ref no. 13380/25600/94960, cas no. 77-99-6, 1,1,1-trimethylolpropane	6 mg/kg
Ref no. 13720/40580, cas no. 110-63-4, 1,4-butanediol	5 mg/kg
Ref no. 19540, cas no. 110-16-7, Maleic acid	30 mg/kg
Ref no. 24550/89040, cas no. 57-11-4, Stearic acid	25 mg/kg
Ref no. 37600, cas nr. 65-85-0, Lithium Benzoate	0,6 mg/kg
Ref no. 38515, cas no. 1533-45-5, 4,4′-bis(2-benzoxazolyl)stilbene	0,05 mg/kg
Ref no. 38550, cas no. 882073-43-0, bis(4-propylbenzyldene)propylsorbitol	5 mg/kg
Ref no. 38560, cas no. 7128-64-5, 2,5-bis(5-tert-butyl-2-benzoxazolyl)thiophene	0,6 mg/kg
Ref no. 39090, N,N-Bis(2-hydroxyethyl)alkyl(C8-C18) amine	1,2 mg/kg
Ref no. 39120, N,N-bis(2-hydroxyethyl)alkyl(C 8 - C 18)amine hydrochlorides	1,2 mg/kg
Ref no. 39815, cas no. 182121-12-6, 9,9-bis(methoxymethyl)fluorene	0,05 mg/kg
Ref no. 46640, cas no. 128-37-0, 2,6-ditert-butyl-p-cresol	3 mg/kg
Ref no. 46880, cas no. 65140-91-2, 3,5-di-tert-butyl-4-hydroxybenzylphosphonic acid, monoethyl ester, calcium salt	6 mg/kg
Ref no. 53650/16990, cas no. 107-21-1, Ethyleneglycol	30 mg/kg
Ref no. 55910, cas no. 736150-63-3, glycerides, castor-oil mono-, hydrogenated, acetates	60 mg/kg
Ref no. 66360, cas no. 85209-91-2, 2,2′- methylene bis(4,6-di-tert-butylphenyl) sodium phosphate	5 mg/kg
Ref no. 68320, cas no. 2082-79-3, Octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	6 mg/kg
Ref no. 68860, cas no. 4724-48-5, noctylphosphonic acid	0,05 mg/kg
Ref no. 74640, cas no. 117-81-7, Phthalic acid, bis(2-ethylhexyl)ester	1,5 mg/kg
Ref no. 74880, cas no. 84-74-2, Phthalic acid, dibutyl ester	0,3 mg/kg
Cas no. 85209-91-2, 2,2′-methylene bis(4,6-di-tert- butylphenyl) sodium phosphate	5 mg/kg
Ref no. 89040, cas no. 57-11-4, stearic acid	60 mg/kg
Ref no. 93280, cas no. 693-36-7, Thiodipropionic acid, dioctadecyl ester	5 mg/kg
Ref no. 94560, cas no. 122-20-3, Triisopropanolamine	5 mg/kg
Ref no. 95360, cas no. 27676-62-6, 1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine- 2,4,6(1H,3H,5H)-trione	5 mg/kg
Annex II, Aluminium	1 mg/kg
Annex II, Barium	1 mg/kg
Annex II, Cobalt	0,05 mg/kg
Annex II, Copper	5 mg/kg
Annex II, Iron	48 mg/kg
Annex II, Lithium	0,6 mg/kg
Annex II, Manganese	0,6 mg/kg
Annex II, Zinc	5 mg/kg

Dual Use Additives:
RPC Superfos products may contain dual use substances:

Substance:	E number / Cas. No.
Carbonic acid, salts	E 170
Titanium dioxide	E171
Iron oxide	E172
Aluminium	E173
Sodium benzoate	E211
Vegetal Calcium Stearate	E470a
Magnesium salts of fatty acids	E470b
Mixture of Sodium Salts of Fatty Acids and Magnesium Salts of Fatty Acids	E470a/ E470b
Mono- and diglycerides of fatty acids	E471
Glycerol monostearate/ Glycerol monolaurate	E471
Glycerol monostearate 90%	E471
Polyglycerols esters of fatty acids	E475
Silicon dioxide	E551
Hydrated Magnesium Silicate (Talc)	E553b
Stearic acid	E570
Vegetal Monoglycerides	97593-29-8
Glycerol monostearate	31566-31-1
Lithium Benzoate	553-54-8
Micronised Sodium Benzoate	532-32-1

Product suitability:
The products are suitable for all food types and for any long term storage at room temperature or below.

REACH:
RPC Superfos products are produced from polypropylene polymers, masterbatches, IML's, other labels and inks supplied to us by our suppliers.
As downstream users of these articles it is our responsibility that these articles meet the requirements of the so called REACH legislation (Registration, Evaluation, Authorization, and restriction of Chemicals, 1907/2006 EC with amendments).
Based on confirmations received from our suppliers we hereby confirm that:

- all substances covered by REACH Regulation and used in materials supplied to RPC Superfos has been pre-registered
- no substances listed in the ECHA candidate list of Substances of Very High Concern (SVHC) for authorization updated on the 27 June 2018 are present above 0,1 % by weight in our products.

Use of colourants in plastic materials in contact with food
We hereby confirm that according to the information provided by our suppliers, all colourants we use in the production process comply with Resolution AP (89) 1.

Nanotechnology:
We hereby confirm that products produced at any factory within the RPC Superfos Group are produced without the use of nanoparticles and with no use of nanotechnology.

Materials of animal origin - BSE/TSE
RPC Superfos hereby informs that, according to information provided by our suppliers, raw materials we are using can be synthesized from animal by-products, i.e. hydrolysis etc. of animal fats and oils into fatty acids. However, the manufacturing process of tallow derivatives includes a multistep chemical treatment involving

high temperatures and long residence times. Therefore it fulfills requirements laid down in Regulations 1069/2009/EC, 142/2011/EC, and the "Note for Guidance EMEA/410/01, rev. 3".

Convention on International Trade in Endangered Species of Wild Fauna and Flora
According to the information provided by our suppliers, raw materials we are using to manufacture our products do not contain any substances derived from any endangered species of fauna and flora.

Bisphenol A and S:
Bisphenol A (BPA) is an industrial chemical used in the production of the hard, clear plastic polycarbonate and in epoxy resins used as a protective lining on the inside of metal-based food and beverage cans.
Bisphenol S (BPS) is more heat-stable and photo-resistant than BPA and is seen replacing BPA in polycarbonate and epoxy resins.
RPC Superfos is primarily using polypropylene (PP) plastics and a smaller amount of high density polyethylene (HDPE), for all our products.
RPC Superfos hereby warrants that neither BPA nor BPS is intentionally used in our products.

Phthalates:
RPC Superfos has never intentionally used phthalates in the production of plastic packaging.
Some resin suppliers are using some phthalates in the catalyst system during their production and this may result in traces in the product.
RPC Superfos meets the requirements of EU 10/2011 and any subsequent amendments thereto.
Consequently we are on a continuous basis in collaboration with our suppliers document that any possible trace of phthalates in our product do not exceed the limits stated in 10/2011.

Gluten:
RPC Superfos is not using gluten in our production of plastic packaging. We have evaluated the risk of gluten in our products. The conclusion is that the risk is negligible. None of our raw materials contains gluten and we do not allow eating (or drinking) in our production or warehouses.

Mineral Oil
RPC Superfos hereby confirm that mineral oil is not used in our production of plastic packaging.
Based on information received from our suppliers of IML we confirm that the use of mineral oil have been replaced by vegetable oil. RPC Superfos meets the requirements of EU 10/2011 and any subsequent amendments thereto. Consequently we are on a continuous basis, in collaboration with our suppliers control our processes and perform the required analytical tests to verify compliance.

Nonylphenols
RPC Superfos has never intentionally used nonylphenols in the production of plastic packaging.
We meet the requirements of EU 10/2011 and any subsequent amendments thereto. Consequently RPC Superfos are only using monomers and additives listed in EU 10/2011.

Chlorine:
Generally the printing ink industry uses low levels of chlorinated organic compounds in the production of printing ink in some colors. The chlorine is part of the synthesis route of the pigments and the chlorine ensures the required coloristic and fastness properties of the inks.
RPC Superfos are in continuous dialog with our suppliers of printing ink to reduce the levels of chlorine. Our ink suppliers do not use substances classified as critical, toxic or highly toxic by the EuPIA Exclusion List, nor do they use chlorinated compounds banned from use under the REACH Regulation (EC) No 1907/2006, Title VIII/Annex XVII.
RPC Superfos meets the requirements of EU 10/2011 and any subsequent amendments thereto.
Consequently we are on a continuous basis, in collaboration with our supplier’s document that any possible trace of chlorine in our product does not migrate above the limits stated in 10/2011.

Primary aromatic amines:
Migration of primary aromatic amines is primarily an issue for polyamide food contact materials.
RPC Superfos is using polypropylene (PP) plastics and a smaller amount of high density polyethylene (HDPE), for all products. Further EU10/2011 states that plastic materials and articles shall not release primary aromatic amines, excluding those appearing in Table 1 of Annex I, in a detectable quantity into food or food simulant. The detection limit is 0,01 mg of substance per kg of food or food simulant. The detection limit applies to the sum of primary aromatic. Food contact products produced by RPC Superfos meet the requirements of EU10/2011.

Other chemicals:
The chemical materials listed below are not intentionally used in the manufacture or the formulation of our products and are not expected to be present as RPC Superfos is primarily using polypropylene (PP) plastics and a smaller amount of high density polyethylene (HDPE), for all products, both of which are approved for food contact materials. However, our products have not been tested for these chemical materials:

- formaldehyde
- epoxidised soybean oil (ESBO)
- Melamine

Packaging and packaging waste:
RPC Superfos hereby warrants that our products comply with the European Union Committee Directive 94/62/CE with later amendments and that RPC Superfos meets the national requirements set on basis of these. Consequently we are working on:

- reducing our impact on the environment
- reducing the production of waste
- increasing use of re-cycled material where appropriate

Further as part of complying with the Directive the content of heavy metals (sum of lead, cadmium, mercury and hexavalent chromium) in our products is < 100 ppm.
The management of these requirements is integrated into our environmental management system based on the requirement of ISO14001 and the requirements of EN13430 – Requirements for packaging recoverable by material recycling and EN 13428 – Prevention by source reduction.

Printing inks:
The printing inks used by RPC Superfos are all in compliance with:

- Swiss Ordinance of the FDHA on Materials and Articles (817.023.21)
- EuPIA Guideline on Printing Ink applied to the non-food contact surface packaging materials and articles. The products are produced without inks containing the following substances:

    - Benzophenon
    - 4-Hydroxybenzophenon
    - 4-Methylbenzophenon
    - 2,2'-Dimethoxy-2-phenylacetophenon
    - 1-hydroxy-cyclohexyl phenyl ketone
    - 2,4-diethyl thioanthone (DETX)
    - 2-methyl-4'-(methylthio)-2-morpholinpropiophenone
    - Ethyl-4-dimethylaminobenzoate
    - Methyl-2-benzoylbenzoate

However, in accordance with the Applicable EU legislation it is the responsibility of the customer to ensure that the product supplied by RPC Superfos is suitable for the intended use and that the use is in accordance with the relevant acts of law, statutory orders and other rules and regulations, including the said Directives.

RPC Superfos warrants full traceability of the products delivered throughout the manufacturing process.

RPC Superfos factories are as a minimum certified according to ISO9001 and BRC/IOP.

The present certificate is valid for a period of one year starting from the date first above written.

If you have any questions you are welcome to contact us.

Best regards,

RPC Superfos

Michał Kamiński
Divisional Quality Manager
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RPC SUPERFOS

APPENDIX:

Product Line	Mould No	Colour
UniPak	905	Clear
UniPak	905	White
UniPak	907	Clear
UniPak	907	White
UniPak	908	Clear
UniPak	912	Clear
UniPak	912	White
UniPak	2510	Clear
UniPak	2520	Clear
UniPak	2530	Clear
UniPak	2530	Natural
UniPak	2530	White
UniPak	2540	Clear
UniPak	2540	White
UniPak	2810	Clear
UniPak	2810	White
UniPak	2820	Clear
UniPak	2820	White
UniPak	2830	Clear
UniPak	2830	White
UniPak	2838	White
UniPak	2840	Clear
UniPak	2849	White
UniPak	2900	Clear
UniPak	2900	Clear freeze
UniPak	2900	Green
UniPak	2900	Red
UniPak	2900	White
UniPak	2920	Clear
UniPak	2920	White
UniPak	5011	Clear
UniPak	5011	White
UniPak	5012	Clear
UniPak	5012	White
UniPak	5015	Clear

UniPak	5015	White
UniPak	5016	Clear
UniPak	5022	Clear
UniPak	5028	Clear
UniPak	5030	Clear
UniPak	5030	White
UniPak	5031	Clear
UniPak	5031	White
UniPak	5035	Clear
UniPak	5098	Clear
UniPak	5101	Clear
UniPak	5101	Clear freeze
UniPak	5101	White
UniPak	5102	Clear
UniPak	5102	White
UniPak	5103	Clear
UniPak	5110	Clear
UniPak	5110	White
UniPak	5122	Clear
UniPak	5122	White
UniPak	5130	Clear
UniPak	5130	White
UniPak	5131	Clear
UniPak	5131	White
UniPak	5133	Clear
UniPak	5141	Clear
UniPak	5141	White
UniPak	5220	Clear
UniPak	5220	White
UniPak	5225	Clear
UniPak	5225	White
UniPak	5226	Clear
UniPak	5531	Clear
UniPak	5542	Clear
UniPak	5543	Clear
UniPak	5544	Clear
UniPak	5544	White
UniPak	5548	Clear
UniPak	5610	Clear

UniPak	5621	Clear
UniPak	5624	Clear
UniPak	5630	Clear
UniPak	5630	Natural
UniPak	5630	White
UniPak	5636	Clear

Product Line	**Mould No**	**Colour**
Hobbock	1790	White
Hobbock	1988	White
Hobbock	4320	White
Hobbock	8320	White
RingLock	309	Clear
RingLock	347	Clear
SuperCube Square	2095	White
SuperCube Square	9200	White
SuperLift	1631	Clear
SuperLift	1631	White
SuperLift	1671	Clear
SuperLift	1671	White
SuperLift	4083	White
SuperLift	4117	White
SuperLift	8026	White
SuperLift	8032	Clear
SuperLift	8032	White
SuperLift	8034	White
SuperLift	8038	White
SuperLift	8052	Clear
SuperLift	8052	White
SuperLift	8058	White
SuperLift	8106	White
SuperLift	8116	White