

## DECLARATION OF CONFORMITY

**1. The identity and address of the business operator issuing the declaration of compliance:**

Kram Sp. z o.o.  
ul. Słoneczna 3c  
82-440 Dzierzgoń

**2. The identity and address of the business operator which manufactures or imports the plastic materials or articles or products from intermediate stages of their manufacturing or the substances intended for the manufacturing of those materials and articles:**

Kram Sp. z o.o.  
ul. Słoneczna 3c  
82-440 Dzierzgoń

**3. The identity of the materials, the articles, products from intermediate stages of manufacture or the substances intended for the manufacturing of those materials and articles:**

PVC cling film.

The approximate formulation is as follows:

- 70 - 75% of PVC (K70)
- 20 - 30% of plasticizers which are DEHA [di(2-ethylhexyl) adipate, no. FCM-207], ESBO (Epoxidized soy bean oil, no. FCM-532), and DOTP [(terephthalic acid, bis(2-ethylhexyl)ester), no. FCM-798]
- 5 - 10 % of additives

**4. The version of the declaration:**

03.03.2023

**5. Issue date:**

30.03.2023

**6. Confirmation that the plastic materials or articles, products from intermediate stages of manufacture or the substances meet relevant requirements laid down in the following Regulations and Directives:**

We hereby declare that the product/s **PVC cling film**

is/are being sold by Kram Sp. z o.o. for: **BORDEX PACKAGING B.V.**

fully complies with the E.U. legislation:

- Regulation (EC) No. 1935/2004 concerning materials and articles intended to come into contact with food,
- Commission Regulation (EC) No.2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food and its amendments 282/2008,
- Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food and its amendments
- Directive 94/62 on packaging and packaging waste and its amendments.

7. Adequate information relative to the substances used or products of degradation thereof for which restrictions and/or specifications are set out in Annexes I and II of Regulation 10/2011 to allow the downstream business operators to ensure compliance with those restrictions:

**Overall migration:**

Simulant:	Contact time	Temperature [°C]	Results [mg/dm <sup>2</sup> ]
10 % Ethanol:	10 days	20 °C	0,6 ± 0,5
3% Acetic acid:	10 days	20 °C	< 0,6
Isooctane:	10 days	20 °C	7,95 ± 1,3*
95% Ethanol	10 days	20 °C	8,4 ± 1,3 *

**Specific migration di(2-ethylhexyl) adipate:**

Simulant:	Contact time	Temperature [°C]	Results [mg/kg]
Isooctane:	10 days	20 °C	13,4 ± 1,4*

\* the result received after using the reduction factor 2

The sum of the concentrations of **heavy metals** (Pb, Cd, Hg, Cr) does not exceed 100 ppm.

On the basis of the conducted tests, the presence of any substance added unintentionally (NIAS) in amounts exceeding the permissible standards was not found.

8. Adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 2008/60/EC, 95/45/EC and 2008/84/EC to enable the user of these materials or articles to comply with the relevant EU provisions or, in their absence, with national provisions applicable to food:

Film to which this declaration relates has not dual use additives.

9. Specifications on the use of the material or article, such as:

- a) type or types of food with which it is intended to be put in contact:

Produced by us PVC cling film is suitable for all kind of foodstuff, such us bread, bakers' wares, fruits, vegetables, meat, poultry, fish, mushrooms, meat products and cheese packaging, margarine, butter and other fats and oils produced from water-in-oil emulsion.

- b) time and temperature of treatment and storage in contact with the food:

Any storage time under freezing conditions or up to 30 days at 5 °C < T ≤ 20 °C

- c) the highest food contact surface area to volume ratio for which compliance has been verified in accordance with Article 17 and 18 or equivalent information:

1 dm<sup>2</sup>/100 ml – global migration  
6 dm<sup>2</sup> / 1 kg food – specific migration

10. When a functional barrier is used in a multi-layer material or article, the confirmation that the material or article complies with the requirements of Article 13(2), (3) and (4) or Article 14(2) and (3) of Regulation 10/2011:

Not applicable.

The declaration is issued on the basis of product test results and based on declarations of producers of raw materials and materials used for film production. Declaration is renewed if the composition or the manufacturing process there

are significant changes entailing changes in the migration from the materials or articles are available or if new scientific data.

The declaration applies only to films stored in conditions that we suggested. Suggested storage conditions at temperatures between 0-30°C in a dry place with an optimal date the suitability of 6 months from date of manufacture. Before use, the roll should be kept for 24 hours at room packing.

Prepared by:

 **Specjalista  
ds. Systemów Jakości**  
*Sak*  
**Katarzyna Sak**

**03.03.2023**  
Date and Sign

Approved by:

 *Tylińska*  
**Stales  
Coordinator**  
**Martyna Tylińska**

**30.03.2023**  
Date and Sign