

Declaration of Compliance

Product: **ROVAC A FILM** (Vacuum packaging film)

Date: 24/04/2026

EU Food contact:

The **ROVAC A FILM**, hereafter mentioned as “film”, is produced with raw materials that comply with the relevant requirements of:

- The **Regulation (EC) No 1935/2004** of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food.
- The **Commission Regulation (EU) No 10/2011** of 14 January 2011 on plastic materials and articles intended to come into contact with food, as amended, including Regulations (EU) 2026/245 and 2026/250.

Compliance with Regulation (EU) 2025/351 is based on information currently available from our raw material suppliers. Any pending updates will be incorporated upon receipt of complete and verified documentation. In accordance with the transitional provisions of Regulation (EU) 2025/351, materials placed on the market before 16 September 2026 may continue to be placed on the market until the exhaustion of stocks.

- This product is manufactured according to the requirements of the 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.

Non-Intentionally Added Substances (NIAS):

According to Regulation (EU) No 10/2011, Article 3, a “non-intentionally added substance” (NIAS) means an impurity in the substances used, a reaction intermediate formed during the production process, or a decomposition or reaction product.

In compliance with Article 3 of Regulation (EC) No 1935/2004 and Articles 6(4) and 19 of Regulation (EU) No 10/2011, as amended by Commission Regulation (EU) 2025/351, representative film samples have been subjected to a risk-based NIAS assessment, in accordance with internationally recognized scientific principles.

Based on the available information and the conducted evaluation, no safety concerns have been identified under the intended conditions of use.

Overall migration:

Overall migration tests carried out on this film confirm compliance with the overall migration limit (OML) of 10mg/dm² for food simulants A, B and D2 under OM2 test conditions.

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In accordance with Annex III to Regulation (EU) No 10/2011, these food simulants cover all types of food.

In accordance with Annex V, chapter 3, to Regulation (EU) No 10/2011, the standardised overall migration testing conditions correspond to the following food contact conditions:

Table 3		
Standardised conditions for testing the overall migration		
Column 1	Column 2	Column 3
Test number	Contact time in days [d] or hours [h] at Contact temperature in [°C] for testing	Intended food contact conditions
OM0	30 min at 40 °C	Any food contact at cold or ambient temperatures and for a short duration (≤ 30 minutes).
OM1	10 d at 20 °C	Any food contact at frozen and refrigerated conditions
OM2	10 d at 40 °C	Any long-term storage at room temperature or below, including when packaged under hot-fill conditions, and/or heating up to a temperature T where $70\text{ °C} \leq T \leq 100\text{ °C}$ for a maximum of $t = 120/2^{((T-70)/10)}$ minutes.
OM3	2 h at 70 °C	Any food contact conditions that include hot-fill and/or heating up to a temperature T where $70\text{ °C} \leq T \leq 100\text{ °C}$ for maximum of $t = 120/2^{((T-70)/10)}$ minutes, which are not followed by long-term room temperature or refrigerated storage.

Test OM2 covers also food contact conditions described for OM0, OM1 and OM3.

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Date: 24/04/2026

Information on substances subject to restrictions:

▪ Annex I to Commission Regulation (EU) No 10/2011:

According to the information provided by the raw materials suppliers, available until now, some grades that can be used in the production of the film may contain:

- Substances subject to specific migration limit (SML) <60mg/kg:

Ref. No	CAS No	SML (mg/kg)
12670	0002855-13-2	6
14200 / 41840	0000105-60-2	15
15274 / 18460	0000124-09-4	2,4
18430	0000116-15-4	ND
18820	0000592-41-6	3
19150	0000121-91-5	5
19960	0000108-31-6	30
22660	0000111-66-0	15
26140	0000075-38-7	5
39090	****	1,2
68320	0002082-79-3	6

- Dual-use additives (approved as food additives): E170, E432, E470a, E551, E553b, E570, E1521.

▪ Annex II to Commission Regulation (EU) No 10/2011:

Where applicable, specific migration restrictions set out in Annex II to Regulation (EU) No 10/2011, including those relating to metals, have been taken into account in the compliance assessment. Compliance with applicable limits is ensured under the intended conditions of use.

Heavy metals:

The film is produced with raw materials that comply with the following requirements:

- The European Parliament and Council **Directive 94/62/EC** of 20 December 1994 on packaging and packaging waste (which stipulates that the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed 100ppm by weight).

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The Regulation (EU) 2025/40 (PPWR), which amends Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repeals Directive 94/62/EC, establishes requirements for the entire life cycle of packaging regarding environmental sustainability and labeling to enable its placement on the market. According to Article 71, this regulation will apply from August 12, 2026. Within the transitional period the supply chain is making the necessary adjustments. Moreover, the requirements related to heavy metals as known under Directive 94/62/EC will remain unchanged.

Other substances:

Based on the available information on the raw materials used in the production of the film, we deem that the following substances are neither used nor intentionally added in their formulations. However, the raw materials as well as the film have not been tested for these substances.

- Allergens (as defined in Regulation (EU) No 1169/2011)
- Bisphenol A (BPA) (Regulation (EU) No 2024/3190, as amended by Regulation (EU) 2026/250)
- BADGE, NOGE, BFDGE (Regulation (EC) No 1895/2005)

Notice:

It is the responsibility of the customer to check the suitability of the product for the intended particular purpose.

This declaration only refers to the films in their original form, as supplied by Casfil and does not extend to subsequent modifications.

This declaration shall continue in effect for one year from its issue date.

For further information, please contact a Casfil representative.