

1. Description of the Materials

- **Direct Food Contact:** BOPP; PLA; Kraft Paper
- **Secondary Packaging:** Gloss, Semi-Gloss Paper Adhesive Label
- **Component Layer Breakdown:**
 - *Face Stock:* BOPP; PLA Film; Kraft Paper; Gloss, Semi-Gloss Paper
 - *Adhesive:* Acrylic-based food-grade pressure-sensitive adhesive
 - *Inks:* Low-migration food-safe inks

2. Confirmation of Compliance

- All operations are carried out in accordance with pre-established instructions and procedures to ensure the compliance of the finished product with:

European Union (EU) Requirements

- **Regulation (EC) No 1935/2004:** Materials do not transfer constituents to food in quantities that endanger human health, bring about unacceptable changes in composition, or deteriorate organoleptic characteristics.
- **Regulation (EC) No 2023/2006:** Manufactured in accordance with Good Manufacturing Practice (GMP).
- **Commission Regulation (EU) No 10/2011 (For plastic face stocks/layers):** This is the principal legislation governing LDPE and LLDPE food packaging. It covers authorised monomers, additives, specific migration limits (SMLs), overall migration limits (OMLs) and Declaration of Compliance requirements.
- **Regulation (EU) 2025/40 (PPWR):** Applies to all packaging placed on the EU market, including flexible plastic bags. Covers packaging minimisation, recyclability, recycled content (when applicable), substances of concern, labelling and conformity documentation. Implementation dates vary by requirement.

United States (FDA) Requirements

- **21 CFR Section 175.105 (Adhesives):** Formulated utilizing components cleared safely for indirect food additives.
- **21 CFR Section 175.300 / 176.170 (Paper & Coatings):** Compliant for use in contact with raw, unpeeled fresh agricultural commodities.

3. Specifications on the Intended Use & Restrictions

- **Type of Foodstuff:** Suitable for fresh, chilled, unpeeled, and uncut whole fruit.
- **Contact Conditions:** Direct surface application onto edible/inedible fruit peel (PLU items) or applied externally to clear PET/PP/Fibre retail packaging.
- **Temperature Limits:** Tested safe for storage under refrigeration, cold-chain distribution, and room temperature environments (0°C to 25°C).

4. Migration Testing Summary (Supporting Data Available)

- **Overall Migration Limits (OML):** Complies with the limit of $< 10 \text{ mg/dm}^2$ using Food Simulant E (poly(2,6-diphenyl-p-phenylene oxide)) or Simulant A under standardized testing conditions (10 days at 40°C).
- **Specific Migration Limits (SML):** Conducted upon request from client
- **General:**
 - No added PFAS.
 - No added heavy metals.
 - No restricted substances added.
 - Supplier declarations maintained

5. Applicable PPWR Requirements

Design for Recycling

Material Design: Evaluated as a mono-material PE structure. The inks and adhesives used in the flexographic printing process do not interfere with the PE sorting and recycling streams, qualifying the film for a high recyclability grade

Packaging Minimisation

Packaging has been designed to provide the minimum material necessary while maintaining:

- mechanical strength
- seal integrity
- product protection
- transport performance

Traceability

All materials and final product is traceable

6. Validity & Sign-off

This declaration remains valid until structural material reformulations, print ink substitutions, or fresh regulatory updates take effect.

Authorized Name: *W. Kennard*

Position: CEO

Signature: *W. Kennard*

Date: 1/07/2026.