DECLARATION OF COMPLIANCE

for materials and articles intended to come into contact with food products

23.05.2025 REV1.0

MANUFACTURER'S NAME AND ADDRESS:

"PACK-KLAIPEDA" JSC, Pramonės str. 13, LT-94102 Klaipėda, Lithuania

Our product – ***XPS trays***

The plastic intermediate material complies with relevant requirements laid down in table below:

No.	Regulation	Name	Country
1	Article 3, 11(5), 15 and 17 of Regulation (EU) No 1935/2004	on materials and articles intended to come into contact with food (Framework Regulation).	EU
2	(EU) 10/2011	on plastic materials and articles intended to come into contact with food (Plastics Regulation).	EU
3	(EU) 2020/1245	amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.	EU
4	(EU) 2023/2006	on Good Manufacturing Practices.	EU
5	(EU) 2023/1442 of 11 July 2023	amending Annex, I to Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.	EU
6	(EU) 2023/1627 of 10 August 2023	amending Annex I to Regulation (EU) No 10/2011 as regards the authorisation of the substance bis(2-ethylhexyl)cyclohexane-1,4-dicarboxylate (FCM No 1079).	EU

CONFIRMATION

XPS trays are manufactured with polystyrene monomers, other additives that are authorized under the Plastics Regulation; the above-named products were produced pursuant GMP regulation (EC) no 2023/2006 as last update.

OVERALL MIGRATION TESTING

Overall migration in table 1 performed under the standardized testing conditions set out in EU 10/2011 (Plastic regulation) chapter 3. Overall migration does not exceed 10 mg of total substances released per dm² of food contact surface.

Table 1.

Migration into	Test method	Test report	*Result (mg/dm²)
10% Ethanol (2 h - 70°C)	PN-EN 1186-1:2005	444588/23/VIL/1	3,5 ±1,5
3% Acetic acid (2 h - 70°C)			6,5 ±1,5
95% Ethanol (4 h - 60°C)			1,5 ±1,0
Isooctane (0,5 h – 40 °C)			< 0,5 ±0,5

* the test results comply with the Regulation No. 10/2011 requirements

RESTRICTIONS - Legally required disclosure of substances:

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 to the Regulation 10/2011/EU and which can be found in XPS trays:

Table 2.

Material	FCM No	Substance	SML [mg/kg] (food or food simulant)
Polystyrene resin	-	Zinc from zinc salts	5

Plastic materials and articles shall not release the substance listed in table 2. of Annex II in quantities exceeding the SML expressed in mg/kg food or simulants.

Substances listed in table 3 are only used in accordance with the composition requirements set out in the EU Regulation 10/2011 chapter II.

Table 3.

Substance	Salts allowed in accordance with Article 6(3)(a)	Test method / report	SML [mg/kg] (food or food simulant)	* Migration result into 3% acetic acid [mg/kg] (2 h - 70°C)
Aluminum (Al)	yes	PB-204 ed. VI of 05.10.2020 Report No. 444588/23/VIL/1	≤ 1	< 0,050 ±0,01
Iron (Fe)	yes		≤ 48	< 0,005 ±0,001
Antimony (Sb)	no		≤ 0,04	< 0,005 ±0,001
Cobalt (Co)	yes		≤ 0,05	< 0,005 ±0,001
Copper (Cu)	yes		≤ 5	< 0,005 ±0,001
Magnesium (Mg)	yes		≤ 60	< 0,050 ±0,01
Manganese (Mn)	yes		≤ 0,6	< 0,005 ±0,001
Zinc (Zn)	yes		≤ 5	0,012 ±0,002
Barium (Ba)	yes		≤ 1	< 0,005 ±0,001
Lithium (Li)	yes		≤ 0,6	< 0,005 ±0,001
Arsenic (As)	no		≤ 0,01	< 0,005 ±0,001
Europium (Eu)	yes		≤ 0,05	< 0,005 ±0,001
Gadolinium (Gd)	yes		≤ 0,05	< 0,005 ±0,001
Potassium (K)	yes		≤ 60	< 0,100 ±0,02
Lanthanum (La)	yes		≤ 0,05	< 0,005 ±0,001
Sodium (Na)	yes		≤ 60	< 0,100 ±0,02
Terbium (Tb)	yes		≤ 0,05	< 0,005 ±0,001
Sum of lanthanide - Eu, Gd, La, Tb	yes		≤ 0,05	< 0,005 ±0,001
Calcium (Ca)	yes		< 0,05	< 0,050 ±0,01
Mercury (Hg)	no		≤ 0,01	< 0,005 ±0,001
Lead (Pb)	no		≤ 0,01	< 0,005 ±0,001
Chromium (Cr)	no		≤ 0,01	< 0,005 ±0,001
Cadmium (Cd)	no		≤ 0,01	< 0,002 ±0,001
Nickel (Ni)	no		≤ 0,02	< 0,005 ±0,001

* the test results comply with the Regulation No. 10/2011 requirements

The overall heavy metals (mercury, chromium, lead and cadmium) concentrations do not exceed 100 ppm, limit according to Directive 94/62/EB.

DUAL USE ADDITIVE(S)

“PACK KLAIPEDA” can confirm that during production do not use any DUAL – USE additives listed on Regulation (EC) 1333/2008 or Regulation (EC) 1334/2008.

In the production of XPS film by extrusion an additive is used - E553b (talc).

INFORMATION ON BISPHENOL A

Regulation No 321/2011 amending Regulation (EU) No 10/2011 as regards the restriction of use of Bisphenol A in plastic infant feeding bottles.
BPA is listed in Table 1 of Annex I to Regulation (EU) No 10/2011 the entry concerning substance number 151, named “2,2-bis(4-hydroxyphenyl) propane”, in column 10 (Restrictions and specifications), the following text is inserted: “Not to be used for the manufacture of polycarbonate infant (6) feeding bottles (7). Not to be used for the manufacture of polycarbonate drinking cups or bottles which, due to their spill proof characteristics, are intended for infants (9) and young children (10).”
We hereby confirm that “PACK KLAIPEDA” products and virgin material that are used to produce the products are not affected by this Regulation as we **do not use Bisphenol A (BPA) in the manufacture of XPS film** and it is not used in **production of the PS resin**.

ALLERGEN INFORMATION

We herewith state that that based on suppliers’ information and the manufacturing process of our XPS film, it is unlikely that substances listed in Annex II of the Regulation (EU) No. 1169 / 2011 and in the FDA Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA) are present in the product. We do not intentionally add these substances to our product nor do our suppliers in the raw materials used.

DISCLAIMER

Due to the manufacturing process and raw material used, the formation of NIAS (non-intentionally added substance, such as degradation or reaction products) cannot be excluded. As far as possible, these were assessed by an external laboratory. If a substance is classified as unsafe, will inform the customer immediately. Unintentionally added substances: styrene oligomers.

FINAL USE

Application

XPS trays are intended in the food industry. XPS trays may be used in contact with warm (up to +90 ˚C), cold, liquid, greasy and sour food.

Below 0 ˚C the product may become brittle and could crack or break under load. The article is not suitable for use in conventional stoves or micro – wave, infrared or multi – purpose ovens.

Conditions of contact with food

Any long term storage at room temperature or below, including when packaged under hot-fill conditions (including 2h contact to up to 70°C and 15min to up to 90°C).

Ratio of food contact surface area to volume used to establish the compliance of the product

Surface to volume ratio of 6 dm² per kg of food regarding by EU No 10/2011.

“PACK KLAIPEDA” JSC hereby confirms that results of migration tests shown on Declaration of Compliance are from official migration test report obtained from a third-party an accredited laboratory. Migration tests were performed on the worst product due to the higher risk of migration. The declaration will be renewed when substantial changes in the legislation and/or in the substances or material composition or purity affecting the compliance statement delivered according to this Declaration of compliance.

Prepared by

Annex A. Revisions / Validation of Modifications

Item No.	**Date**	**Revisions / Modification Results** (No modifications / paragraphs modified / version modified)	**First name, last name and position of the person responsible**
1	23-05-2025	Prepared REV1.0	Aurelija Liubertienė Quality Manager
2			
3			