

This document is a Declaration of Compliance within the meaning of Article 16(1) of Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food.

1. General Product Information

Date:	11.02.2026	Rev. Nr.	00
Producer:	Constantia Alucap srl Via Paludi 29 I-38051 Borgo Valsugana (Trento) - Italy		
Customer:	PACKINOV 574 rue du Chat Botté Z.A.C des Malettes 01700 BEYNOST (France)		
Customer Spec.:	Die-cut lids Ø82,5mm PET white 50 my printed (art. 01966988) and Ø95,5mm PET white 50my printed (art. 01960288 and art. 01960295)		

Material description (from the outer to the inner layer):

Layer:	based on
UV printing	Acrylates
PET white film	Polyethylenterephthalat
Heat Sealing lacquer	Styrene-butadiene

Food contact layer: heat sealing lacquer

Type of package/application: peelable lid intended for dairy products, sweets.

2. Compliance with Food Contact Legislation

2.1 General

The product named on this declaration complies with the applicable requirements of

- EU "Framework" Regulation (EC) No. 1935/2004
- Commission Regulation (EU) No 10/2011 relating to plastic materials and articles intended to come into contact with foodstuffs
- Regulation (EC) No. 2023/2006 on good manufacturing practice
- Directive 94/62/EC and the Model Toxics in Packaging Legislation (as drafted by the Toxics in Packaging Clearinghouse/ Source Reduction Council of CONEG) regarding the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium < 100 ppm.

Italy:

- D.Min. 21/03/1973 and subsequent updates and appendices.

2.2 Conditions of Use

The product is suitable for direct contact with food.

Nature of food: dairy products, sweets.

Time/temperature conditions: continuous cold storage.

A surface to volume ratio of 6 dm²/kg food has been used to determine compliance.

2.3 Compliance with Overall Migration Limit (OML) of the Food Contact Layers

EU Regulation No. 10/2011 sets out the test conditions for **plastic** materials and articles. Other test conditions for the determination of the overall migration may be considered for products which do not fall under the scope of 10/2011/EC or for which specific measures exist on national level.

The product is in compliance with the OML of 10 mg/dm² following evaluation of relevant samples under following test conditions:

Food simulant	Testing conditions (time/temperature)	Global Migration in [mg/dm ²]
3 % acetic acid	10 d 20°C	<10
50 % ethanol	10 d 20°C	<10
Olive oil	10 d 20°C	<10

The compliance refers only to migration compliance and not to technical fit-for-use.

2.4 Compliance of Non Food Contact Side

2.4.1 Printing inks (no specific harmonized EU legislation)

The used printing inks have been formulated in compliance with the EuPIA Exclusion Policy for Printing Inks. The printed product complies with Section A of the Annex of Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

Based on information received from suppliers the inks used to manufacture the product are formulated and manufactured in accordance with the EuPIA "Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles".

2.4.2 Print primer

The lacquer fulfils the requirements of Article 3 of the EU-Framework Regulation 1935/2004/EC if applied on the non-food contact surface of food packaging.

2.5 Plastic

The composition of the PET film is according to Regulation (EU) No 10/2011 and amendments.

2.6 Compliance of the Food Contact Layers

Layer	Country	Legal Provisions (recommendations, code of practice, decrees) for plastics, paper, adhesives, coatings and other components
PET film	EU	All starting monomers and additives are listed in the union list of EU Regulation No. 10/2011 as amended
	USA	21 CFR § 177.1630 for all types of food
heat seal layer	EU	All starting monomers and additives are listed in the union list of EU Regulation No. 10/2011 as amended
	USA	21 CFR § 177.300

2.7 Compliance with Specific Restrictions

The used raw materials contain substances that have a restriction according to EU Regulation No. 10/2011 as amended.

The restricted substances listed in the following table may be present in the finished product:

Chemical name	CAS nr.	PM/Ref	Restriction*		
Acetic acid, ethyl ester	141-78-6	30140	60	mg/kg	SML
Terephthalic acid	100-21-0	24910	7,5	mg/kg	SML
Isophthalic acid	121-91-5	19150	5	mg/kg	SML
Ethylene glycol	107-21-1	16990	30	mg/kg	SML
Alpha-methylstyrene	98-93-9		0.05	mg/kg	SML
Xylene isomers	1330-20-7		1,2	mg/kg	SML
Ethyl Benzene	100-41-4		0,6	mg/kg	SML
Butadiene	106-99-0	10630	1	mg/kg	QM
Maleic anhydride	108-31-6		30	mg/kg	SML (T)
2,6-Di-tert-butyl-p-cresol (BHT)	128-37-0	46640	3	mg/kg	SML
Silicon dioxide	7631-86-9		60	mg/kg	SML
Talc	14807-96-9		60	mg/kg	SML
Methylproxitol	107-98-2		60	mg/kg	SML
9,9-bis(methoxymethyl)fluorene	182121-12-6	39815	0,05	mg/kg	SML
Zinc			5	mg/kg	
Aluminium	7429-90-5		1	mg/kg	
Antimony trioxide	1309-64-4	35760	0,04	mg/kg	SML
Lithium	7439-93-2		0,6	mg/kg	SML
Ethyleneglycol and Diethyleneglycol	107-21-1 / 111-46-6	16990/ 15760	30	mg/kg	QM(T)
Manganese acetate	2180-18-9		0.6	mg/kg	Expressed as Mn
Acrylic acid and its esters		group 22	6	mg/kg	SML (T) expressed as acrylic acid

Metacrylic acid, its esters and methacrylic anhydride		group 23	6	mg/kg	SML (T) expressed as methacrylic acid
N-methylolacrylamide	924-42-5	21940	0.01	mg/kg	SML
Acetaldehyde	75-07-0	10060	6	mg/kg	SML (T)

* restrictions can be a specific migration limit (SML), a maximum concentration (QM), a maximum quantity per surface area (QMA), or a 'no detectable migration' (ND) requirement at a certain detection limit (DL). Suffix (T) indicates a combined restriction for 2 or more substances.

The above list of restricted substances is complete to the extent that accurate information was received from our raw material suppliers.

The restrictions have been checked by an accredited 3rd party laboratory. For migration tests suitable food simulants have been used. The restrictions were proved not to be exceeded either by analytical testing or by worst case calculation when used under the conditions specified in section 2.2. For the evaluation an area / volume ratio of 6 dm² / 1 kg food was taken into account.

2.8 Dual Use Additives

As required by EU Regulation No. 10/2011 the following table identifies substances used as additives in plastics and subject to a restriction in food through an authorization as food additive or flavouring (as listed in the Union *Guideline* on Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, point 3.6.3 table 1 and 2.)

Chemical name	Food Additive	Restriction in plastics
2,6-Di-tert-butyl-p-cresol (BHT)	E321	SML 3 mg/kg
Talc	E553b	SML 60 mg/kg
Silicon dioxide	E551	SML 60 mg/kg
Zinc acetate	E650	SML 5 mg/kg Expressed as Zn
Phosphoric acid	E338	-
Potassium hydroxide	E525	SML 60 mg/kg

The above list of dual use additives is complete to the extent that accurate information was received from our raw material suppliers.

2.9 Bisphenol A and other bisphenols and bisphenol derivatives

Bisphenol A and other bisphenols and bisphenol derivatives are no compositional component of the used raw materials and we do not add them during the manufacture of the product.

Thus, the product complies with the applicable requirements of EU Regulation 2024/3190/EC and with the requirements set out in Articles 3, 15 and 17 of Regulation (EC) No 1935/2004.

2.10 Phthalates

We confirm that the product constitutionally does not contain phthalate plasticizers. This information is based on a theoretical evaluation of the formulation/specification and the confirmations from raw material suppliers. Since we do not expect these substances to be present, we do not analyze for them in the delivered product.

2.12 Perfluoroalkyl and Polyfluoroalkyl substances (PFAS)

We confirm that the product constitutionally does not contain PFAS (a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom). This information is based on a theoretical evaluation of the formulation/specification and the confirmations from raw material suppliers. Since we do not expect these substances to be present, we do not analyze for them in the delivered product.

3. Supporting Documents

Appropriate documentation including supplier DoCs, test results, calculations and other evidence on the safety or reasoning demonstrating compliance are retained on the production site and can be shown to the competent authority on their request.

4. Disclaimer

This declaration is given in good faith and to the best of our current knowledge. It describes the status of the products specified under General Product Information.

The user of the material (or downstream user, if applicable) is responsible for ensuring that all relevant legislation (e.g. work safety, etc.) is complied with during the production process and that the finished packed product complies with all migration limits applicable for the food product for which the material is used. Furthermore, the food packer is responsible for verifying possible interactions of the material or its components with the foodstuffs (e.g. modification of odour, taste, consistency, migration, seal integrity etc.) prior to use and especially in cases of changes in the food recipe, processing parameters or end-use of the product, in order to ensure that the packaging material is still appropriate for the intended use.

This declaration replaces all previous declarations for the same specification. It remains valid until a relevant change in the legislation or new relevant scientific information changes the legal status of the delivered specification.

Responsible Quality Manager: Alessandro Zurlo
Approved by Product Management by Giovanni Pizzato on 11.02.2026
Approved by Regulatory Affairs Management by Alessandro Zurlo on 11.02.2026

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