

DECLARATION OF COMPLIANCE FOR SEMI-FINISHED PRODUCTS INTENDED TO COME INTO CONTACT WITH FOOD

Date of issue: February 4th 2022 ¹⁾

Vink Plast ApS hereby declare that:

Vink PP-H Grey FCM rods and finished parts machined from these products by Vink Plast ApS ²⁾:

- Comply with the requirements of the regulation (EC) no. 1935/2004
- Comply with the European directive (EU) 10/2011 as amended up to and inclusive the commission Regulation (EC) no. 2020/1245
- Comply with Declaration 681/2020/DK

The products are tested according to the methods for “examination of utensils” by means of several samples, according to regulation 80.30-1 (EC) up to 80.30-18 (EC) of the official List of Testing procedures according to § 64 LFGB (Germany), as well as the series of standards DIN EN 1186-1 (allowed are substitute media for olive oil and common sunflower oil).

The specimens would be dry machined by the manufacturer and washed by the test laboratory with distilled water before testing. Due to the fact, that influence of any cooling agents used during any wet machining process, any such migration has not been tested, this should be done in an additional step. According to the general rules for migration tests, the total migration and the specific migration (SML) of individual substances were determined by using food stimulants (distilled water, 10 % ethanol (simulant A), 95 % ethanol, 3 % acetic acid (simulant B) and common sunflower oil (simulant D2) and pre-defined testing conditions (3 x 10 days contact time at 40 °C; standard testing conditions OM2). 95 % ethanol would be used according to the guideline 82/711/EWG in such cases that based to technical reasons the use of olive oil or sunflower oil was not possible in these analysis.

Each test specimen were deposited in 200 ml simulant (for each dm² surface) and was tested in a repeated determination. Surface-Volume-Ratio 6:1 according to test laboratory.

Due to the fact that the materials are made for applications with multiple use, the migration tests has to be made with each specimen three times. The accordance with the above mentioned food regulation has to be done with the result of the third migration test. The data of the third migration test was the base for abundance of the specific migration limits (SML).

The evaluated data of total migration and specific migration limits are lower than the given critical values.

The test of the influence to odor and taste was done according to DIN 10955 (sensory test of packaging for foods). Test food was mineral water, 10 % alcohol (made from weakening from Vodka and drinking water), 0,2 % cider vinegar as well as coconut oil. The contact time was 24 hours at 4-8 °C.

For the substance-specific test were used accredited methods as well as methods from the official collections according to § 64 LFGB or DIN regulations. Determinations for substances without any of these methods are made according to validated methods of the test laboratory. Dual used substances are not named by the laboratory. In the tested material there were no functional barrier used.

Results:**Global migration:**

	Global migration rods	Upper limiting value ^(*) , ^(**)
Simulant A (10 % ethanol OM2, 3x10 days, 40 °C)	2,7 mg/dm ²	10 mg/dm ² (<60 mg/kg food)
Simulant B (3 % acetic acid OM2, 3x10 days, 40 °C)	2,6 mg/dm ²	10 mg/dm ² (<60 mg/kg food)
Simulant D2 (sunflower oil OM2, 3x10 days, 40 °C)	2,5 mg/dm ²	10 mg/dm ² (<50 mg/kg food)
Volatile substances vacuum method (1 h, 60 °C, 1,3 kPa)	<2 mg/dm ²	2 mg/dm ² ^(***)

^(*) Regulation EU no. 10/2011 respectively consumer goods ordinance

^(**) According to Article 12 of Regulation EU no. 10/2011 applies only to plastics which are intended to come into contact with foodstuffs for infants and young children

^(***) Technical Guidelines for Migration Testing in the Framework of Regulation EU no. 10/2011

Specific migration:

Monomer/Additives	Simulant A, OM2, 10 % Ethanol	Simulant B, OM2, 3 % Acetic acid	Simulant D2, OM2, Sunflower oil	Upper limiting value ^(*)
1	< 0,6 mg/kg ^(**) < 0,5 mg/dm ²	< 0,6 mg/kg ^(**) < 0,5 mg/dm ²	< 0,6 mg/kg ^(**) < 0,5 mg/dm ²	5 mg/kg LS
2	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	0,04 mg/kg LS
3	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	0,01 mg/kg LS
4	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	< 0,01 mg/kg ^(**) < 0,002 mg/dm ²	0,01 mg/kg LS

^(*) Regulation (EU) no. 10/2011 respectively consumer goods ordinance

^(**) The results are based on a surface-to-volume ratio of 6:1

For each deviating surface-to-volume ratio, another migration value results. This shall be taken into account, when assessing the final product, taking into account Article 17 of Regulation (EU) no. 10/2011. In order to verify conformity, the specific migration values are to be converted, as appropriate, in accordance with Article 17 of Regulation (EU) no. 10/2011, taking into account the surface-to-volume ratio in mg/kg foodstuffs applicable to actual or planned use.

LS = Food or Food stimulant.

Test of the influence to the odor and taste of food with direct contact:

	Odor	Taste	Upper limiting value ^(*)
Mineral water (24h, 4-8 °C)	No noticeable deviation (intensive scale 1)	No noticeable deviation (intensive scale 1)	Intensive scale 2,5
10 Vol. % Ethanol (24h, 4-8 °C)	No noticeable deviation (intensive scale 1)	No noticeable deviation (intensive scale 1)	Intensive scale 2,5
0,2 % Cider vinegar (24h, 4-8 °C)	No noticeable deviation (intensive scale 0)	No noticeable deviation (intensive scale 1)	Intensive scale 2,5
Milk (24h, 4-8 °C)	No noticeable deviation (intensive scale 0)	No noticeable deviation (intensive scale 1)	Intensive scale 2,5
Coconut oil (24h, 4-8 °C)	No noticeable deviation (intensive scale 0)	No noticeable deviation (intensive scale 1)	Intensive scale 2,5

^(*) Regulation (EU) No. 1935/2004 Food and Feed Regulation

Intensive scale for odor and taste in independence to DIN 10955

0 = No noticeable deviation

1 = Just noticeable deviation

2 = Weak noticeable deviation

3 = Clear noticeable deviation

4 = Intensive deviation

Valuation of the Results:

Based on the results the rods of Vink PP-H Grey FCM can be safely used with the following limits according to Regulation (EU) 10/2011 for manufacturing finished products for companies which are preparing and processing foodstuffs.

During the tests with the food simulants for aqueous, alcoholic and fatty foods under test conditions (3x10 days at 40 °C) there are determined no exceedances of maximum limits (upper limiting values) of the global migration.

During the test of compliance with the substance-specific limits there were determined also no exceedances of the maximum limits. With the sensory test there are determined no or just noticeable deviations.

According to these above mentioned products is in accordance to (EU) no. 1935/2004 as well as with food- and animal foodstuff with the above mentioned limits (LFGB).

1. The above mentioned PP is suitable for production of multiple use products for all food contact terms under all contact conditions covered by the standard conditions OM2 set out in Annex V, Chapter 3 of Regulation (EU) no. 10/2011. The materials are thus suitable for unlimited long-term contact under cooling and freezing conditions as well as long-term contact of up to 30 days at room temperature.
2. The above mentioned PP is suitable for production of multiple use products with all food categories under all contact conditions covered by the standard conditions OM3 set out in Annex V, Chapter 3, of Regulation (EU) no. 10/2011. The materials are thus suitable for any contact conditions comprising heating to 70 °C for 2 hours or heating to 100 °C for 15 minutes.
3. The above mentioned PP is not suitable for production of single use products due to the fact, that it is not tested.

It remains the responsibility of the customer putting the plastic article manufactured from the products into the intended use, to assess the final suitability of the plastics material for the intended food contact application; i.e. checking if the physical properties of the plastics material make it suitable for the intended application, checking compliances of the finished plastic article with the relevant migration limits, checking for possible influence of the plastics material on the composition and/or organoleptic properties of the contacting foodstuff, etc.

Notes:

¹⁾ This declaration expires 5 years after its date of issue or in case of regulatory or compositional changes which require reevaluation. Please always contact Vink Plast' customer service for latest version. For information about available dimensions, please contact Vink Plast' customer service.

²⁾ Regulation (EC) no. 1935/2004 of the European Parliament and the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC – Article 16.

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