

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

Date of issue: August 3th 2021 1)

Vink Plast ApS hereby declare that:

## VINK POM-C natural FCM rods and sheets 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 relevant requirements in Regulation (EU) No 10/2011 of the Commission of January, 14<sup>th</sup> 2011 on plastic materials and articles intended to come into contact with food, as amended up to and inclusive the commission Regulation (EU) no. 2019/37.
- Are manufactured and handled according to good manufacturing practice (GMP) as set out in the (EC) 2023/2006 of December 22<sup>th</sup> 2006 on good manufacturing practice for materials and articles intended to come into contact with food.
- 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 LFBG (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 (stimulant A), 3% acetic acid (stimulant B) and common sunflower oil (stimulant D2) and pre-defined testing conditions (1-4 h contact time at 100°C or reflow).

Each test specimen were deposited in 200 ml stimulant (for each  $dm^2$  surface) and is tested in a repeated determination. The surface for each specimen was between 0,34 and 0,38  $dm^2$ . Surface-Volume-Ratio 5:1 according 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 abidance 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 the odor and taste was done according DIN 10955 (sensory test of packaging for foods). Test food was mineral water, 10% alcohol (made by 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. As a dual use substance, only natural silicates were named by the test laboratory.

No functional barrier is used in this product.

#### Result

Global migration

Global Higration		
	Global migration rods	Upper limiting value (*)
Simulant A (10% Ethanol) OM6, 3 x 4	6,5 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup>
h, reflow	-	(12)
Simulant B (3% acetic acid) OM6, 3 x	5,6 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup>
4 h, reflow	-	(12)
Simulant D2 (sunflower oil) OM4, 3 x	12,5 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup>
1 h, 100°C	-	(13)

<sup>(\*)</sup> Regulation (EC) No 10/2011 respectively consumer goods ordinance

According the method 80.30 (EC) official list of commonality of the analytical method corresponding to § 64 LFGB applies the migration test with olive oil / sunflower oil or its substitutes a part as directive conform if you pass the global

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migration with an analysis tolerance of maximum 3 mg/dm<sup>2</sup>. All parts will apply with all other food stimulant with the migration test as directive conform if you pass the global migration with an analysis tolerance of maximum 2 mg/dm<sup>2</sup>.

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

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

(\*) regulation (EC) No 1935/2004, article 3 - Intensive scale for odor and gestation in independence to DIN 10955: 0 = No noticeable deviation 1 = Just noticeable deviation 2 = Weak noticeable deviation 3 = Clear noticeable deviation 4 = Intensive deviation

Specific Migration

Specific Migration	0: 1 1 1 100/	T 0: 1 1 D 00/	T 0: 1 1 D 0	1 1 1 10 10
Monomer/Additive	Simulant A 10%	Simulant B 3%	Simulant D2	Upper limiting value
	Ethanol OM6, 3 x 4	Acetic Acid OM6, 3	sunflower oil OM4,	(*)
	h, reflow	x 4 h, reflow	3 x 1 h, 100°C	
Triethylenglycol-bis[3-(3-	≤ 0,3 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	9 mg/kg LS
ter-4-hydroxy-5-				1,5 mg/dm <sup>2</sup>
methylphenyl)propionate]				
1,3 Dioxolane	< 0,5 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	5 mg/kg LS
				0,83mg/dm <sup>2</sup>
Octadecyl-3 (3,5-di-tert-	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	6 mg/kg LS
butyl-4-hydroxphynyl)			, ,	1 mg/dm <sup>2</sup>
propionate				
1,3,5-Trioxane	< 0,1 mg/dm <sup>2</sup>	< 0,5 mg/dm <sup>2</sup>	< 0,1 mg/dm <sup>2</sup>	5 mg/kg LS
•	, 5	, ,	, ,	0,83 mg/dm <sup>2</sup>
1,4 Butandiole	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	< 0,2 mg/dm <sup>2</sup>	5 mg/kg LS
•	, 5	, ,	, ,	0,83 mg/dm <sup>2</sup>
Tetrahydrofuran	< 0,02 mg/dm <sup>2</sup>	< 0,02 mg/dm <sup>2</sup>	< 0,02 mg/dm <sup>2</sup>	0,6 mg/kg LS
,	, 5	, 3	, 3	0,1 mg/dm <sup>2</sup>
Melamine	< 0,35 mg/dm <sup>2</sup>	< 0,1 mg/dm <sup>2</sup>	< 0,1 mg/dm <sup>2</sup>	2,5 mg/kg LS
	, 5		, 5	0,41 mg/dm <sup>2</sup>

<sup>(\*)</sup> Regulation (EC) No 10/2011 respectively consumer goods ordinance

## Additional residual contents in the final article

Monomer/Additives	Results	Upper limiting value (*)
1,4 butanediol formal	< 1 mg/kg plastic	1 mg/kg plastic

<sup>(\*)</sup> Regulation (EC) No 10/2011, 1282/2011, 1183/2012 respectively consumer goods ordinance

Migration of a decomposition product

Monomer/additives	Dest. Water	Upper limiting value (*)
formaldehyde	< 0,25 mg/dm <sup>2</sup>	15 mg/kg LS
·	-	2.5 mg/dm <sup>2</sup>

<sup>(\*)</sup> regulation (EC) No 10/2011, 1282/2011, 1183/2012 respectively consumer goods ordinance LS = Food or food simulant

## Valuation of the results

Based on the results the semi-finished products of POM-C can be safely used with following limits according the Regulation (EC) 10/2011 and its namedchanges for manufacture of finished products for companies which are preparing and processing foodstuffs.

1. The test results show that the above mentioned POM-C is suitable for production of multiple use products for all food contact terms with all food stuff, where you have to use food simulant A, B and C according annex III, tab 2 of (EC) 10/2011.

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LS = Food or food stimulant



- The test results show that the above mentioned POM-C is suitable for production of multiple use products for all food contact terms up to 121°C with all food stuff, where you have to use food simulant D1 or D2.
- The above mentioned POM-C is not suitable for production of single use products, due to the fact that it is not tested.

According to these the above mentioned product is in accordance to (EC)No. 1935/2004 as well as with food- and animal feedstuff with above mentioned limits (LFGB).

With all limits 1 to 3 the consumer has to be informed. This means that the product has to be marked clearly so that nobody will use it accidentally and not in accordance to the intended use.

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 compliance of the finished plastics 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.

For information about available dimensions, please contact Vink Plast' customer service.

## Notes

<sup>1)</sup> This declaration expires 5 years after its date of issue or in case of regulatory or compositional changes which require reevaluation. The latest version will always be available on <a href="https://www.vink.dk">www.vink.dk</a>. For information about available dimensions please contact Vink Plast Customer Service.

<sup>2)</sup> Regulation (EC) no. 1935/2004 of the European Parlaiment and Council of October 27<sup>th</sup> 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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