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Declaration of Compliance

Food contact materials · Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR)

Issued by	Plastdurker Kft. HU-1113 Budapest, Badacsonyi utca 13/A Tax no.: 12317011-2-43 · Company reg. no.: 01-09-665605
Product	**PA/PP CO-EXTRUDED FILM AND HEAT-TREATABLE (COOK-IN) POUCHES**, transparent, 90 µm, unprinted
Structure (outside → inside)	Polyamide (PA) – tie layer – polypropylene (PP). The PP layer is in contact with food. There is no functional barrier.
Manufacturer	EU / non-EU film manufacturer as stated on the delivery note and product label; full identity and address available on request
Intended use	Packaging of non-fatty foods, including heat treatment in the pouch (cooking, pasteurisation, sterilisation) within the limits of section 5
Scope	Product supplied by Plastdurker Kft. from approved manufacturers whose supporting declarations are held on file
Document no.	PD-DoC-PAPP-2026-10
Date of issue	02/10/2026
Valid until	01/10/2027 (12 months from issue), or until a change in composition or legislation

1. EU food contact legislation

Plastdurker Kft. declares that the PA/PP film and cook-in pouches is produced from raw materials and under conditions that comply with the relevant requirements of:

- **Regulation (EC) No 1935/2004** of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food;
- **Commission Regulation (EU) No 10/2011** of 14 January 2011 on plastic materials and articles intended to come into contact with food, as last amended by Commission Regulation (EU) 2026/245;
- **Commission Regulation (EC) No 2023/2006** of 22 December 2006 on good manufacturing practice (GMP) for materials and articles intended to come into contact with food;
- **Commission Regulation (EU) 2024/3190** on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives in food contact materials, as corrected by Regulation (EU) 2026/250;
- **Commission Regulation (EC) No 1895/2005** on the restriction of use of certain epoxy derivatives (BADGE, BFDGE, NOGE).

Compliance with Commission Regulation (EU) 2025/351, which amends Regulations (EU) No 10/2011, (EU) 2022/1616 and (EC) No 2023/2006, is based on the information currently available from our suppliers. In accordance with its transitional provisions, materials placed on the market before 16 September 2026 may continue to be placed on the market until stocks are exhausted.

2. Non-intentionally added substances (NIAS)

According to Article 3 of Regulation (EU) No 10/2011, a “non-intentionally added substance” (NIAS) is an impurity in the substances used, a reaction intermediate formed during production, or a decomposition or reaction product.

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In line with Article 3 of Regulation (EC) No 1935/2004 and Articles 6(4) and 19 of Regulation (EU) No 10/2011, the manufacturer has assessed NIAS in the PA/PP film and cook-in pouches according to internationally recognised scientific principles of risk assessment. Based on the available information, no safety concern has been identified under the intended conditions of use.

3. Overall migration

According to the film manufacturer, overall migration tests by an accredited laboratory confirm compliance with the overall migration limit of **10 mg/dm²** for the food types in section 5, up to **OM5** test conditions of Annex V (high-temperature applications up to 121 °C), with a surface-to-volume ratio of 6 dm²/kg. The test reports are confidential and can be viewed at the manufacturer's site.

4. Specific migration and restricted substances

Annex I and II. According to the manufacturer, the specific migration limits of Annex I and the restrictions of Annex II (metals) are respected under the conditions of section 5. Caprolactam and other polyamide monomers are covered by the high-temperature tests.

Ink heavy metals (printed products only). Where printed, the inks are formulated according to the EuPIA exclusion policy and meet the heavy-metal limits of Resolution AP(89)1. This declaration covers unprinted products.

5. Conditions of use and heat treatment

- Types of food: all types of food **except** animal and vegetable fats and oils, foods preserved in an oily medium, sauces of a fatty character, and nuts in paste or cream form.
- Storage: long-term storage at room temperature or below, including chilled and frozen storage.
- Heat treatment in the pouch: up to **121 °C**. Migration has been validated for up to 6 hours at 121 °C; for pouch performance the manufacturer recommends a maximum of **4 hours at 121 °C**. Lower temperatures for shorter times are covered for the food types above.
- **Not validated:** microwave heating, and long low-temperature cooking (for example 70 °C for 12–14 hours). These uses are not covered by this declaration.
- Surface-to-volume ratio used to establish compliance: 6 dm²/kg.

USA. The polyolefin food-contact layer complies with US FDA 21 CFR 177.1520 for use with the food types of 21 CFR 176.170(c) Table 1 under conditions of use A–H of Table 2, according to the manufacturer.

6. Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR)

Regulation (EU) 2025/40 amends Regulation (EU) 2019/1020 and Directive (EU) 2019/904 and repeals Directive 94/62/EC. It sets sustainability and labelling requirements for the whole life cycle of packaging as a condition for placing packaging on the market, and has applied since **12 August 2026** (Article 71). Based on the official declarations of our suppliers and the available analytical results, Plastdurker Kft. declares the following:

6.1 Heavy metals – Article 5(4). The sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr VI) resulting from substances present in the PA/PP film and cook-in pouches does not exceed **100 mg/kg**.

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6.2 PFAS in food-contact packaging – Article 5(5). Since 12 August 2026, food-contact packaging must not be placed on the market if it contains per- and polyfluoroalkyl substances (PFAS) at or above the limits below. The PA/PP film and cook-in pouches complies with these limits:

PFAS parameter	PPWR limit	Status
Any individual PFAS, targeted analysis (polymeric PFAS excluded)	< 25 ppb (µg/kg)	Compliant
Sum of PFAS, targeted analysis, with prior degradation of precursors where applicable (polymeric PFAS excluded)	< 250 ppb (µg/kg)	Compliant
PFAS including polymeric PFAS, measured as total fluorine (TF)	< 50 ppm (mg/kg)	Compliant

This is based on the film manufacturer's declarations under Regulation (EU) 2025/40 (July and 31 August 2026) and its PFAS statement (June 2026): PFAS are not intentionally added to the raw materials or during production. The approach follows the stepwise method in the European Commission's guidance on Regulation (EU) 2025/40 (C(2026) 3702, June 2026), which starts from total fluorine. This assessment reflects current knowledge and may be revised if the guidance is clarified.

6.3 Substances of concern – Article 5(1). The presence and concentration of substances of concern in the PA/PP film and cook-in pouches are minimised, as described in the REACH and other-substances sections of this declaration.

6.4 Recycled content – Article 7. The manufacturer does not use recycled material in production, so the product contains **no post-consumer recycled plastic**. The recycled-content targets of Article 7 apply from 1 January 2030.

6.5 Recyclability – Article 6. PA/PP is a multi-material structure. Such structures are generally assessed as having limited recyclability in polypropylene recycling streams. The recyclability performance grades will apply once the delegated acts under Article 6 are adopted.

6.6 Labelling and technical documentation. The harmonised labelling requirements of Article 12 will apply from 12 August 2028 (or 24 months after the implementing act, if later). On request, Plastdurker Kft. will give its customers the information and supplier evidence they need for the technical documentation referred to in Annex VII and the EU declaration of conformity (Article 39).

7. REACH – Regulation (EC) No 1907/2006

According to the declarations of our suppliers, no substance on the ECHA Candidate List of Substances of Very High Concern (SVHC), as updated on 4 February 2026 (253 entries), is present in the product at a concentration above **0.1% (w/w)**. No substance listed in Annex XIV is used, and the applicable restrictions of Annex XVII are respected. If this changes, Plastdurker Kft. will inform its customers in line with Article 33 of REACH.

8. Other substances

Based on the information available on the raw materials, the following substances are neither used nor intentionally added. Unless stated otherwise, the product has not been specifically tested for them.

- Allergens listed in Annex II of Regulation (EU) No 1169/2011
- Bisphenol A (BPA) and other hazardous bisphenols (Regulation (EU) 2024/3190)
- BADGE, BFDGE and NOGE (Regulation (EC) No 1895/2005)
- Ortho-phthalates as plasticisers (DEHP, DBP, BBP, DIBP, DINP, DIDP)
- Genetically modified organisms (GMO); nanomaterials
- Per- and polyfluoroalkyl substances (PFAS) – see the PPWR section

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9. Notice

It is the customer's responsibility to check that the product is suitable for the intended use, and that the final packaging and packed food comply under real conditions of use (type of food, contact time, temperature and surface-to-volume ratio).

This declaration covers only the PA/PP film and cook-in pouches in its original form, as supplied by Plastdurker Kft. It does not cover later changes such as printing, lamination, conversion or the addition of other materials.

Traceability (Article 17 of Regulation (EC) No 1935/2004) is ensured through the roll, lot or box number on the product label and the Plastdurker delivery note. Supporting documents (Article 16 of Regulation (EU) No 10/2011) are available to the competent authorities on request.

This declaration is valid for 12 months from its date of issue. It will be updated earlier if there is a significant change in production, raw materials or the applicable legislation.

Budapest, 02/10/2026

Plastdurker Kft.
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Sales and Finance Manager

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Authorised signature and company stamp