

## Declaration of Compliance

in accordance with Annex IV of Commission Regulation (EU) No. 10/2011 of 14 January 2011

**Manufacturer and issuer of the declaration:** Volginsky Plastics Manufacturing Company Ltd (OOO VZLP)  
Zavodskaya street 144, Volginsky, Vladimir region, 601125, Russia  
Web: box4food.ru, Phone: +7 495 909-81-87, E-mail: info@aerosnab.ru

**Name of products:** Disposable polypropylene food containers SOUS 30, SOUS 50, SOUS 80.

We hereby confirm that the above mentioned product complies with the legal regulations laid down in the European Plastic Regulation (EU) No 10/2011, in the Regulation (EC) No 1935/2004, both as amended, in Commission Regulation (EC) No 2023/2006, as well as in Directive 94/62/EC.

When used as specified, the overall migrations as well as the specific migration do not exceed the legal limits. The testing was performed according to Regulation (EU) No 10/2011 (Annex V) in the Test laboratory of Latvian Certification Centre Ltd. (accredited body No. LATAK-T-138)

The materials and raw materials used comply with Plastic Regulation (EU) No 10/2011

### Information relative to the used substances:

*This product contains no monomers which are regulated with a specific migration limit.*

*This product contains one or more additives which are regulated with a specific migration limit. The identity of this/these substance(s) can be disclosed for testing purposes upon special request and under maintaining secrecy.*

*In referring to the food contact certificates provided by suppliers, we are confident that the total additives level in this material is below the limit.*

### Note on dual use substances:

*In this product there are no dual use substances.*

### Specification of the intended use or restrictions:

- Type or types of food or processes for which the material is suitable:

*Disposable plastic containers are designed for packaging various types of food products.*

- Conditions of use including duration and temperature of treatment or storage while in contact with the food:

*The containers are designed for storing food products refrigerated and at room temperature up to 40 °C for up to 72 hours*

*The containers are not intended for cooking.*

- Test conditions:

*Overall migration tests were carried out by filling samples with corresponding food simulants (A, B and D2) and exposing 10 days at a temperature of +40°C.*

*Specific migration tests were carried out by filling samples with 3% acetic acid and exposing 10 days at a temperature of +60°C.*

- Test report references:

*Test Report No. 89648 A dated 25 September 2020.*

- Ratio of food contact surface area to volume used to determine the compliance of the material or article:

*6 dm<sup>2</sup>/kg food*

A functional barrier made from plastic is not used in the above mentioned product.[]

This declaration is valid for the product we delivered and its use as specified above. The verification of compliance was performed based on the above rules; according to which the product complies with the legal requirements subject to adherence to the stated conditions for contact with food. In case of deviations from the intended use, the user is responsible for verifying compliance and suitability.

In particular it is emphasized that in the case of printed material, no contact is allowed between the printing ink and the food product.

**Additional Compliance Details:**

We can confirm that the components do not contain, or are formulated to contain any major food allergens. This statement includes but is not exclusive to celery, eggs, fish, milk, mustard, peanuts, nut derivatives, sesame seeds, crustacean shellfish, soybeans, sulphites, sulphur dioxide, tree nuts and wheat.

We also confirm that our products do not contain any of the following substances:

- Arsenic and arsenic compounds
- Asbestos
- Biocides
- Bisphenol A (BPA), Bisphenol F (BPF) and Bisphenol S (BPS)
- Formaldehyde
- Halogens and halogenated compounds
- Natural rubber latex
- Phthalates
- PVC
- Toluene
- VOC's

**REACH Compliance:**

As polymers are exempted from registration (REACH article 2, (9)) our company is therefore not obliged to register its products.

Our company has taken the following actions to achieve REACH-compliance:

1. We request from all of our suppliers a documentation to assure compliance with REACH with regard (pre-) registration of all affected substances;
2. We have tested all our products and confirmed that they do not contain any of the SVHC published on the latest version of REACH Candidate list;
3. We ask all our suppliers to confirm that the raw materials do not contain substances of very high concern (SVHC).

This declaration is in reference to article 33 of REACH and applies to the finished products, as they leave our warehouse and does not cover any eventual further alterations done by users.

**Packing and packaging waste directive compliance:**

Heavy metals (EN 13428)

Analysis of the content of heavy metals is based on the tests of the above mentioned product. On this basis we declare that the content of heavy metals, such as lead, cadmium, mercury and hexavalent chrome does not exceed 100 ppm.

Hazardous substances (EN 13428)

Substances (and mixtures) classified as hazardous to the environment according CLP Regulation (EC) 1272/2008 have been minimized according to standard EN13428:2004.

This statement is based on the documentation of conformity provided by our subcontractors.

Packaging minimization (EN 13428)

This package does not use more packaging material than it is necessary in order for the packaging being able to/must meet the functions mentioned in EN 13429. The process has been carried out according to EN 13428.

Reuse of packaging (EN 13429)

This packaging film is not designed for re-use.

Recovery – Material recycling (EN 13430)

This product has potential to be recycled by recovery technology.

Recovery – Energy recovery (EN 13431)

The calorific gain from PP in an energy recovery process is 41 MJ/kg.

Recovery – Biodegradability (EN 13432)

Product is neither biodegradable nor compostable.

**Place/date/signature:**



Vladislav Pomerantsev, General Manager  
29 September 2020. Volginsky, Russia

## TEST REPORT No 89648 A

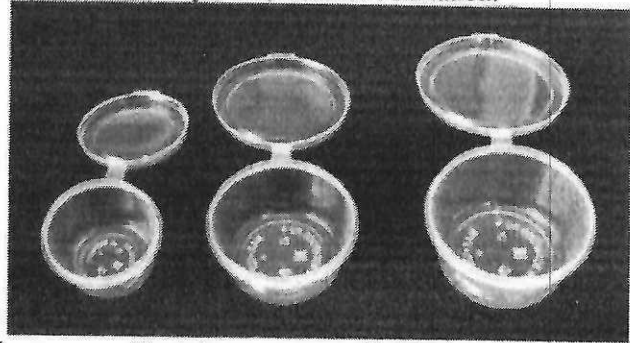
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1. Customer, it's address **Center for Testing and European Certification - CTEC, Individual merchant, 5-69 Engures Str., Jurmala, LV-2016, Latvia.**

2. Sample identification according to the test request No L-18934 from 07/09/2020:  
 Sample name: **Disposable polypropylene food containers: Sous 30, SOUS 50, SOUS 80.**  
 Manufacturer: **Volginkiy Plastics Manufacturing Company Ltd. (OOO "VZLP"), ul. Zavodskaya, 144, Volginsky. Vladimirskaya obl., Russian Federation.**  
 Sample amount **90 pcs (3 x 30 pcs)**

3. Sample description/photo

Transparent plastic containers with a volume of 30 mL, 50 mL and 80 mL.



4. Testing time  
 Received 07/09/2020      Started 08/09/2020      Finished 25/09/2020

### 5. Test results and methods

#### 5.1 Organoleptic assessment

Tested parameter	Test result	Test method
Organoleptic assessment of distilled water after the test:		
- smell intensity	grade 0	T-138-31-1:2011
- taste intensity	grade 0	

*Organoleptic assessment was carried out by filling samples with distilled water and exposing 10 days at a temperature of +40°C. Surface/volume ratio by organoleptic assessment was 6:1.*

Explanation: grade 0 - unchanged      grade 2 - minor changes      grade 4 - strong changes  
 grade 1 - just perceptible changes      grade 3 - major changes

#### 5.2 Overall migration

Tested parameter	Test result	Test method
Overall migration to food simulant A (Ethanol 10%)	< 1 mg/dm <sup>2</sup> surface area of sample	EN 1186-9:2002
Overall migration to food simulant B (Acetic acid 3%)	< 1 mg/dm <sup>2</sup> surface area of sample	EN 1186-9:2002
Overall migration to food simulant D2 (Vegetable oil)	< 3 mg/dm <sup>2</sup> surface area of sample	EN 1186-8:2002

*Overall migration tests were carried out by filling samples with corresponding food simulants and exposing 10 days at a temperature of +40°C.*

Requirements: The overall migration limit – 10 mg/dm<sup>2</sup> (Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food)



Z. Veseris  
 Laboratory Manager  
 25/09/2020



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**5.3 Specific migration of primary aromatic amines**

Tested parameter	Test result	Test method
Migration of primary aromatic amines to food simulant B (Acetic acid 3%)	< 0.002 mg/kg food simulant	L 00.00-6

*The specific migration test was carried out by filling samples with 3% acetic acid and exposing 10 days at a temperature of +60°C. Surface/volume ratio in specific migration test was 6:1.*

Requirements:

- Primary aromatic amines shall not be released in a detectable quantity into food simulant, the detection limit is 0,01 mg of substance per kg of food simulant (Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, Annex II)

**5.4 Specific migration of Barium, Cobalt, Copper, Iron, Lithium, Manganese, Zinc, Aluminium, Nickel**

Tested parameter	Test result	Test method
Specific migration to food simulant B (Acetic acid 3%):		
- Barium	< 0.1 mg/kg food simulant	EN ISO 11885:2009
- Cobalt	< 0.005 mg/kg food simulant	EN ISO 11885:2009
- Copper	< 0.5 mg/kg food simulant	EN ISO 11885:2009
- Iron	< 1.0 mg/kg food simulant	EN ISO 11885:2009
- Lithium	< 0.05 mg/kg food simulant	EN ISO 11885:2009
- Manganese	< 0.05 mg/kg food simulant	EN ISO 11885:2009
- Zinc	< 0.5 mg/kg food simulant	EN ISO 11885:2009
- Aluminium	< 0.5 mg/kg food simulant	EN ISO 11885:2009
- Nickel	< 0.01 mg/kg food simulant	EN ISO 11885:2009

*The specific migration test was carried out by filling samples with 3% acetic acid and exposing 10 days at a temperature of +60°C. Surface/volume ratio in specific migration test was 6:1.*

Requirements:

- Specific migration limits: Barium - 1 mg/kg food simulant, Cobalt - 0,05 mg/kg food simulant; Copper - 5 mg/kg food simulant; Iron - 48 mg/kg food simulant; Lithium - 0,6 mg/kg food simulant; Manganese - 0,6 mg/kg food simulant; Zinc - 5 mg/kg food simulant, Aluminium - 1 mg/kg food simulant, Nickel - 0.02 mg/kg food simulant (Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, Annex II)

**5.5 Specific migration of bisphenol A**

Tested parameter	Test result	Test method
Migration of bisphenol A to food simulant B (Acetic acid 3%)	< 0.05 mg/kg food simulant	LVS CEN/TS 13130-13 2005

*The specific migration test was carried out by filling samples with 3% acetic acid and exposing 10 days at a temperature of +60°C. Surface/volume ratio in specific migration test was 6:1.*

Requirements:

Specific migration limit for bisphenol A is 0.05 mg per kg of food simulant (Commission Regulation (EU) 2018/213 of 12 February 2018 on the use of bisphenol A in varnishes and coatings intended to come into contact with food and amending Regulation (EU) No 10/2011 as regards the use of that substance in plastic food materials).

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**5.6 Content of Cadmium, Mercury, Lead, Chromium (VI)**

Tested parameter	Test result	Test method
Cadmium	< 1 mg/kg	LVS EN 1122:2001
Mercury	< 0.2 mg/kg	LVS EN 1122:2001 modif.
Lead	< 2 mg/kg	LVS EN 1122:2001 modif.
Chromium (VI)	< 2 mg/kg	LVS EN 1122:2001 modif.
Sum of Cadmium, Mercury, Lead and Chromium (VI)	< 5 mg/kg	—

Requirements:

- Sum of concentration of Lead, Cadmium, Mercury and Hexavalent Chromium shall not exceed 100 ppm (100 mg/kg) (European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste);
- Concentration of Cadmium (expressed as Cd metal) shall not be equal to or greater than 0.01 % by weight of the plastic material (Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Annex XVII, Entry 23).

**5.7 Specific migration of phthalates**

Tested parameter	Test result	Test method
Specific migration to food simulant B (Acetic acid 3%):		
Diisodecylphthalate (DIDP)	< 0.01 mg/kg food simulant	Gas chromatography/ mass spectrometry
Diisononylphthalate (DINP)	< 0.01 mg/kg food simulant	Gas chromatography/ mass spectrometry
Di-(2-ethylhexyl)phthalate (DEHP)	< 0.01 mg/kg food simulant	Gas chromatography/ mass spectrometry
Dibutylphthalate (DBP)	< 0.01 mg/kg food simulant	Gas chromatography/ mass spectrometry
Benzylbutylphthalate (BBP)	< 0.01 mg/kg food simulant	Gas chromatography/ mass spectrometry

The specific migration test was carried out by filling samples with 3% acetic acid and exposing 10 days at a temperature of +60°C. Surface/volume ratio in specific migration test was 6:1.

Requirements:

- Specific migration limits: Sum of Diisononylphthalate (DINP) and Diisodecylphthalate (DIDP) - 9 mg/kg food simulant; Di-(2-ethylhexyl)phthalate (DEHP) - 1,5 mg/kg food simulant; Dibutylphthalate (DBP) - 0,3 mg/kg food simulant; Benzylbutylphthalate (BBP) - 30 mg/kg food simulant (Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, Annex I)

Z. Veseris  
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25/09/2020