

Regulatory Compliance Certificate

BOPET Films

PETLAIN, PETMET, PETWIST, PETEX, PETROPIC

Table of contents

Food-contact EU
Food contact US
Migration Tests
Specific Migration (SML)
Dual use substances (Food additives)
Heavy metals: RoHS, WEEE, Packaging Waste, CONEG
Absence of substances and chemicals
Recycling
Contact with which food types
NANO Materials
Notice: For metalized BOPET film
GMP / Food contact
Allergen Statement
GMO
REACH / SVHC
Statement of Islamic Law (Halal)

Food-contact EU

We confirm that the production of our BOPET films that Süper Film supplies to the customer is made only from the materials sanctioned by EC Regulations for food contact packaging.

All components are in conformance with **COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011** including its amendments (EU) No. 1282/2011 of November 28,2011, (EU) No. 1183/2012 of November 30,2012, (EU) No. 202/2014 of 3 March 2014, (EU) No.2015/174 of 5 February 2015, (EU) No. 2016/1416 of 24 August 2016 and **(EU) 2017/752 of 28 April 2017** on plastic materials and articles intended to come into contact with food or national legislations as listed.

Our BOPET films also meets the relevant requirements of Regulation (EC) 1935/2004 (27/10/2004) on materials and articles intended to come into contact with food.

BOPET films are produced only from virgin resins and do not contain post-consumer recycled components, and no obligation exists under the 282/2008/EC.

Spain: Official State Bulletin published the Royal Decree 1025/2015 of 13 November (amending a previous one) on the conditions to be met by recycled raw materials based on polymeric materials for their use in packaging and other articles in contact with food.

Whereas Super Film Amb. San. And Tic. A.Ş. supplies to its customers the adequate information to allow them to fulfil their own responsibilities, the converters do have to check and confirm that the final article meets both the technical and regulatory requirements of the application.



SÜPER FİLM AMBALAJ SANAYİ VE TİCARET A.Ş.

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Food contact US

We confirm that the production of our BOPET films that Super Film supplies to the customer is made only from the materials sanctioned by FDA.

All components comply with the US Food, Drug and Cosmetic Act of 1958 and applicable indirect food additive regulations of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under title 21 CFR section 177.1630.

The stabilizer used in the raw material is listed in the "List of Substances" under item (b) of section 178.2010 "Antioxidants and/or Stabilizers for Polymers" of 21 CFR. It is indicated that maximum limitation for the stabilizer is 0,1% by weight of polyethylene phthalate polymers complying with section 177.1630. The amount of stabilizer in the raw materials is well below this threshold.

All our raw materials' components are listed in the "List of Substances and Limitations" under item (e)(4)(i) of the same section of 21 CFR.

Migration Test - EC

We confirm that the films complies with Commission Regulation (EU) 2016/1416, overall migration limit.

In accordance with Commission Regulation (EU) 2016/1416, the overall migration shall not exceed 10 mg/dm² from plastic materials and articles, with the exception for plastic materials and articles intended to contact infant or child food (60mg/kg).

Our BOPET films are tested under the conditions 10 days at 40°C, in the three standard food simulants; olive oil (simulant D2), acetic acid solution (simulant B) and ethyl alcohol solution (simulant A), show that the overall migration limit of 60 mg/kg or 10 mg/dm² food is not exceeded in accordance with European Standards ENV- 1186:2002.

Compliance with the overall and specific migration limits as described above must be measured from the final packaging intended to come into contact with foodstuff by using real food or appropriate food simulants at the intended and foreseeable conditions of use as specified in Annex III of Commission Regulation (EU) 2016/1416. It is the responsibility of the converter or food packer to verify that the final packaging complies with the overall and specific migration limits as set out by the applicable legislation.

Specific Migration

We would like to confirm that our BOPET films contain some SML substances according to EU commission 2016/1416. SML information is given for special for film code as confidential document. Please contact with sales department.

We confirm that we got all SML information of our raw materials from our suppliers and according to our worst case calculation for our formulations, we do not exceed specific migration limits.

Maximum usage quantity is given by raw material suppliers and the films are formulated accordingly to not to exceed specific migration limits.

Total packaging structure are beyond the control of SUPER FILM and are a part of the responsibility of the user of our product.

Dual use substances (Food additives)

We would like to also inform you that our films which are produced in SÜPER FİLM, can contain some dual use additives according to EU 1333/2008 (and its amendments) regulation. Please contact with sales department and request for dual use information.

Heavy metals: RoHS, WEEE, Packaging Waste 94/62/EC, CONEG

We confirm that the BOPET films comply with the relevant requirements of the following Directives or Regulations:

- 2003/11/EC as amended
- 2011/65/EU (RoHS) as amended
- 2002/96/EC (WEEE) as amended
- 2000/53/EC (EoL) as amended
- Regulation (EC) 1907/2006, annex XVII, as amended in Regulation (EC) 1272/2008 (CLP), repealing
- 76/769/EEC, as amended
- 94/62/EC (Packaging Waste Directive) as amended
- USA CONEG Regulation
- France: Décret n°2007-1467 du 12 octobre 2007 and Code de l'environnement, section 5-Emballages, sub-section 1, Articles R 543-42 to R 543-52

We confirm that the films meet above mentioned legislations requirements of not containing more than 100 ppm of heavy metals.

Absence of substances and chemicals

In the BOPET films which are produced by SÜPER FİLM AMB. SAN. VE TİC. A.Ş. that we supply you, we can say that they are not formulated with below mentioned substances, which means that we do not intentionally use it as a raw material. And this is also declared and certified by our raw material suppliers. Therefore we do not expect they are presence. However, products have not been tested for these chemical materials.

- Acrylonitrile
- Benzo [def]chrysene (Benzo[a]pyrene)
- 1,7,7-trimethyl-3- (phenylmethylene)byclo[2.2.1.]heptan-2- one(3-benzylidenecamphor)
- (-+)-1,7,7-trimethyl-3-[(4- methylphenyl)methylene]bicyclo[2.2.1]he ptanes-2-one(4-methylbenzylidene camphor)
- Dicyclohexyl phthalate (DCHP)
- Isocyanates
- Active – intelligent materials
- Antraquinone
- Aromatic amines
- Asbestos
- Azodicarbonamide or semi-carbazide compounds
- Benzophenone, hydroxybenzophenone and 4-methyl benzophenone
- Benzonitrile
- Biocides
- Bisphenol-A (BPA), Bisphenol-S (BPS) and Bisphenol-F (BPF)
- Brominated flame retardants
- Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC)
- Decabromodiphenylether (decaBDE)

- 2-Ethylhexanoic Acid (2-EHA)
- Di(ethylhexyl) adipate (DEHA) and di(ethylhexyl) maleate (DEHM)
- Dimethyl Fumarate (DMF)
- Dioxins and furans
- Endocrine Disruptors listed in the Japanese authority list “Strategic Programs on Environmental
- Endocrine Disruptors '98 (SPEED '98) - Table-3: Chemicals Suspected of Having Endocrine Disrupting Effects”
- Epoxy derivatives:
 - BADGE [2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether],
 - BFDGE [bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ether],
 - NOGE [novolac glycidyl ether]

as defined in Directive 2002/16/EC amended by 2004/13/EC, repealed by the Regulation 1895/2005/EC

- Epoxidised Soya Bean Oil (ESBO)
- Isopropyltioxanthone (ITX)
- GMO's
- Lactone
- Latexes
- Cyanuric acid
- Mercapto mix
- N-ethyl-o,p-toluolsulfonamide (NETSA) (CAS nb 1077-66-1)
- N-ethyl-p-toluenesulphonamide (NE-PTSA) (CAS nb 80-39-7)
- Nonylphenol and its derivatives
- Organo-tin compounds as tributyl-tin (TBT), dibutyl-tin (DBT), monobutyl-tin (MBT)
- Pentabromodiphenyl ether, octabromodiphenyl ether
- Perfluorinated tenside (PFT), Perfluorooctanoic acid (PFOA) & Perfluorooctane sulfonate (PFOS) listed in Directive 2006/122/EC
- Photoinitiators
- Poly(aromatic hydrocarbons) according to US Environmental Protection Agency Method 610 (EPA 610)
- Polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), polybrominated terphenyls (PBTs)
- Polychlorinated biphenyls (PCBs), polychlorinated terphenyls (PCTs), polychlorinated naphtalenes (PCNs)
- Polycyclic Aromatic Hydrocarbons (PAH)
- Halogenated Hydrocarbons
- Polyethylene Glycol (PEG)
- Recycled products as defined by Regulation (EC) 282/2008
- Short chained chlorinated paraffins
- Silicone
- Styrene
- Tert-butyl-4-hydroxyanisole (BHA) and 2,6-di-tert-butyl-p-cresol (BHT)
- Thiuram mix
- Titanium Acetyl Acetone (TAA)
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) (CAS nb 3380-34-5)
- Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC, ...)
- Xylol-xylene
- Di-isobutylphthalate (DIBP)
- Diarsenic trioxide (HBCDD)
- Diarsenic pentaoxide
- Lead chromate
- Lead sulfochromate yellow (CI Pigment Yellow 34)
- Lead chromate molybdate sulphate red (CI Pigment Red 104)
- Tris(2-chloroethyl)phosphate (TCEP)

- 2,4-dinitrotoluene (2,4-DNT)
- Tris (2,4-di-tert-butylphenyl) phosphite (CAS Nr: 31570-04-4)
- MOSH (Mineral Oil Saturated Hydrocarbon)
- MOAH (Mineral Oil Aromatic Hydrocarbon)
- di- n-octyltin thiobenzoate 2-ethylhexyl mercaptoacetate
- benzoic acid, methyl ester
- benzoic acid, ethyl ester
- 4-hydroxybenzoic acid, propyl ester
- 4-hydroxybenzoic acid, methyl ester
- 4-hydroxybenzoic acid, ethyl ester
- benzoic acid, butyl ester
- benzoic acid, propyl ester
- 4-hydroxybenzoic acid, isopropyl ester
- 3,5-di-tert-butyl-4-hydroxybenzoic acid, 2,4-di-tert-butylphenyl ester
- 3,5-di-tert-butyl-4-hydroxybenzoic acid, hexadecyl ester
- Substances listed in:
 - GADSL, “Global Automotive Declarable Substance List” 2010
 - IKEA Specification, IOS-MAT-0010, 2009-10-09, version AA-10911-9, chapter 3 & 6
 - IKEA Specification, IOS-MAT-0054, 2009-10-09, version AA-92520-5

This certificate will be updated when appropriate. Therefore, it is recommended to contact with sales represents at least once a year for these subjects. It is the responsibility of the customer to check the suitability of the finished article for the intended application.

Recycling

We also declare that our films can be recycled; in most cases, mechanical recycling can be performed.

Contact with which food types

Although the above-mentioned products are intended for general food use (i.e. intended for food contact with foodstuffs of all types) it is the responsibility of the user to verify its suitability for his own intended food application.

NANO Materials

This letter confirms that all BOPET films which are produced by Super Film are free of any NANO MATERIALS. We can say that they are not formulated with these substances, which means that we do not intentionally use them as raw material. Therefore, we do not expect their presence.

This concerns only the composition of our films produced by us and does not guarantee the compliance of final articles made by using our films.

Notice: For metalized BOPET film

We also remind that metallized films are intended to be used with the non-metallized side in contact with food and the user must verify that the films are suitable for the end use and for the products to be packed in.

GMP / Food contact



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The production and distribution processes of BOPET films have been submitted to a systematic review in regards to Good Manufacturing Practices as defined by the framework Regulation (EC) 1935/2004 and the "GMP" Regulation (EC) 2023/2006 as amended. As a result of this review, Süper Film Amb. San. Ve Tic. A.Ş. can state that the production and distribution processes of this product are compliant with the here-above mentioned Regulations.

Allergen Statement

The food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of this product. However, this product has not been tested for these substances

GMO

Among the large variety of polymer additives that we are using, only a few of them may be genetically modified. We would like to comment on the relevance of gene modification techniques to plastic materials. The most significant fact is that the starting substances or additives possibly deriving from genetically modified organisms based materials are manufactured through multi-step conversion and/or purification processes, involving aggressive conditions like high temperature and pressure as well as action of chemically reactive substances. The final plastic materials themselves are produced under high temperature conditions and are further submitted during conversion processes (extrusion, moulding) to high temperature for a significant period of time.

On the basis of current scientific knowledge, it can be stated that no DNA and no proteins from a given organism (genetically modified or not) can resist to such a series of treatments. Therefore, their presence in our polymers and in plastic articles manufactured from them is unexpected.

In conclusion, we confirm that the above grade is safe to be manufactured, processed and used, even if it is manufactured from starting substances or contain additives which may be of genetically modified organism's origin.

REACH / SVHC

Süper Film is committed to fully respect REACH legislation and will only use fully REACH compliant raw materials.

We are aware of the new European Community Regulation (EC 1907/2006) titled REACH (Registration, Evaluation, Authorization and Restriction of Chemical substances) which entered into force on 1st June 2007.

According to the definition given in Article 3 number 3 of Regulation (EC) No 1907/2006 (REACH) and the Technical Guidance Document on requirements for substances in articles, packaging films are regarded as articles, since their form or surface determines their function to a greater degree than does their chemical composition. Articles don't require registration under REACH.

We also declare that our films contain no substances of very high concern (SVHC) list published at ECHA website updated 12/01/2017 are present above 0.1% by weight in products which are produced by SÜPER FİLM AMBALAJ SANAYİ VE TİCARET A.Ş.

Notwithstanding the fact that the substances referred to in this declaration have not been intentionally added during the production process of the Süper Film products, the absence of such substances has not been verified by analysis or tests and is therefore declared to the best of our knowledge and based on the information available to us from our raw material suppliers. It can therefore not be excluded that trace levels of these substances may be unintentionally present (amongst others because they may be ubiquitous in the environment) or may result from the specific characteristics of the raw materials or the manufacturing process and are therefore not picked up by our quality control.

This declaration does not warrant any specific properties and does not relieve processor from carrying out its own in-house tests and inspections amongst others to determine their suitability for a particular purpose.

Our guarantee is not cover any subsequent modification of the composition of the products, whatever that modification may be, any usage which might produce a denaturalized material, inappropriate use of material or objects.

Statement of Islamic Law (HALAL)

- *Pig, lard or dog*
- *Blood*
- *Carnivorous animals (excluding fish).*
- *Birds with talons or feed by snatching tearing*
- *Reptiles & insects*
- *Marine animals except fish*
- *Animals that live on land & water*
- *Animals that have died by any means other than according to Islamic Law.*
- *Animals generally considered repulsive*
- *The bodies of animals permitted under Islamic Law but not slaughtered according to Islamic Law.*
- *Wine, ethyl alcohol or spirits which remain in their original chemical form*
- *Any product or by-product derived from one or more of the above.*

Concerning the absence of above substances in all BOPET films, we can say that they are not formulated with this substance, which means that we do not intentionally use it as raw material. Therefore, we do not expect its presence. This concerns only the composition of BOPET films produced by us and does not guarantee the compliance of final articles made by using our BOPET films.

Disclaimer: This declaration has been prepared and issued on the basis of information provided by our raw material suppliers, of currently applicable laws and regulations and to the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. SÜPER FİLM makes no warranties which extend beyond the description contained herein. Nothing herein shall constitute any warranty of merchantability or fitness for a particular purpose. It is the customer's responsibility to inspect and test our products in order to satisfy itself as to the suitability of the products for the customer's particular purpose. The customer is responsible for the appropriate, safe and legal use, processing and handling of our products. No liability can be accepted in respect of the use of SÜPER FİLM products in conjunction with other materials. The information contained herein relates exclusively to our products when not used in conjunction with any third party materials.

Please feel free to contact us if you have any question.

SUPER FILM - Regulatory Affairs



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