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Hereby we declare that our produced PE stretch films have a composition that complies with the following regulations:

1. Commission Regulation (EU) No 10/2011 and its successive amendments up to 31 August 2023 including EU 2023/1627
2. Regulation (EC) No 1935/2004 and its amendment Regulation (EU) 2019/1381 and its latest consolidated version on 27 March 2021
3. Commission Directive 2002/72/EC and its amendment up to 28 January 2011 including Commission Directive 2011/8/EU
4. Commission Regulation (EC) No 2023/2006 of 22 December 2006 (on good manufacturing practice for materials and articles intended to come into contact with food) amended by Commission Regulation (EC) No 282/2008 of 27 March 2008
5. Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency

OVERALL MIGRATION:

EUROPEN UNION:

We confirm that for the production of our films, we use only monomers, starting substances and additives listed in the Union List of Authorized Substances of 10/2011 and its successive amendments up to 31 August 2023.

Reference	Food Simulant	Abbreviation	Time & Temperatuer
EU	Acetic acid 3 % (w/v)	Simulant B	40°C / 10 days
	Ethanol 50 % (v/v)	Simulant D1	40°C / 10 days
	Vegetable oil	Simulant D2	40°C / 10 days

authorized maximum limits defined in EC Directive 2002/72/E and EU Regulation 10/2011:

- For aqueous simulants: 10 mg/dm² with an analytical tolerance 2 mg/dm²
- For fatty simulants: 10 mg/dm² with an analytical tolerance 3 mg/dm²

SPECIFIC MIGRATION:

The same simulants as for OML are used for SML testing and the results for the specific migration of chemical substances mentioned in the table is below the limit values.

Chemical Substance	Ref. No	SML (mg/kg)
Vinylidene fluoride	26140	5
Hexafluoropropylene	18430	0.01
Octadecyl 3 (3,5-di-tert-butyl-4-hydroxyphenyl) propionate	68320	6
TNPP, Phosphorous acid, tris(nonyl- and/or dinonylphenyl)ester	74400	30
Zinc	/	25
Di-n-octyltin compound	/	0.006
1-hexene	18820	3
Manganese	/	0.6
Methacrylic acid	20020	6

Chemical Substance	Food Simulant	Abbreviation	SML (mg/kg)
Aluminium	Acetic acid 3 % (w/v)	Simulant B	1
Ammonium			-
Antimony			0.04
Arsenic			N.D
Barium			1
Cadmium			N.D
Calcium			-
Chromium			N.D
Cobalt			0.05
Copper			5
Europium			0.05
Gadolinium			0.05
Iron			48
Lanthanum			0.05
Lead			N.D
Lithium			0.6
Magnesium			-
Manganese			0.6
Mercury			N.D
Nickel			0.02
Potassium	-		
Sodium	-		
Terbium	0.05		
Zinc	5		

N.D: Not Detectable

DUAL USE ADDITIVES:

We confirm that in our films there are no food additives or flavorings subject to a restriction in food.

Our films contain the following food additives that may be used in the manufacture of plastic material and articles and comply with Annex III DIRECTIVE 2002/72/ EC and has specific migration limit restriction in referring to the food contact certificates provided by suppliers.

Chemical Substance	PM Ref.	E Number	Conc. Maxi (ppm)
Calcium carbonate	42500	E170	10
Talc	92080	E553b	10
Polyethyleneglycol	76960	/	210
Glycerol, esters with acids	56486	E471	4330
Polyethyleneglycol esters of aliphatic monocarboxylic acids (C6- C22) and their ammonium and sodium sulphates	77702	/	1360
1,2-propanediol	81840	E1520	550
Zinc acetate	/	E260	700

HEAVY METALS:

The heavy metals, cadmium, lead, mercury and chromium VI are not intentionally used for the production of our PE stretch films. The sum of the heavy metals incidentally present in our mentioned products are below 100 ppm as declared by the raw material suppliers. Therefore our films comply with the following regulations:

- Directive 94/62/EC on packaging and packaging waste is amended by Directive (EU) 2018/852
- Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast)
- Directive 2012/19/EU on waste electrical and electronic equipment (WEEE)

NIAS:

- Non-intentionally added substances (NIAS) comprise all substances that have not been added for a technical reason during manufacturing of food contact materials and articles. They have various sources and can be grouped into side products, breakdown products, and contaminants.
- We declare that no intentionally added substances are formed or introduced in the manufacture or formulation of PE products and NIAS do not exceed the limit value in our PE stretch Films.

1) EPOXY Derivatives :

According to 1895/2005/ EC (Directive 01/61/ECC and 05/1895/CEE) the epoxy derivatives include BADGE, BFDGE AND NOGE are not intentionally used during the production.

- Bisphenol A Di- Glycidyl ether (BADGE)
- 2, 3-dihydroxypropyl ether (BADGE, H₂O)
- 2, 3-dihydroxypropyl glycidyl (BADGE.2 H₂O)
- 3-chloro-2-hydroxypropyl glycidyl (BADGE.HCl)
- 3-chloro-2-hydroxypropyl ether (BADGE.2HCl)
- (3-chloro-2-hydroxypropyl) -2, 3-dihydroxypropyl ether (BADGE.H₂O.HCl)
- Bis (4-hydroxyphenyl) methane (BFDGE)
- Novolac glycidyl ethers(NOGE)

2) PHTHALATES:

The phthalates (as listed in Decision 99/815/EC, Decision 2004/781/EC, Regulation 1907/2006/EC and Commission Regulation (EU) 2018/2005) are not intentionally added in the above mentioned films. However DIBP, DBP, DEP and ethyl isobutyl phthalate could be as minor components; maximum residuals are no more than 15 ppm.

- Bis (2 ethylhexyl) phthalate (DEHP)
- Dibutyl phthalate (DBP) Benzyl butyl phthalate (BBP)
- Di isononyl phthalate (DINP) Di- isodecyl phthalate (DIDP)
- Di-n-octyl phthalate (DNOP)
- Di-n-hexyl phthalate (DNHP)
- Di-n-ethyl phthalate (DEP)
- Di-n-methyl phthalate (DMEP)
- Di-n-pentyl phthalate (DPEP)

3) ALLERGENS:

Our films do not contain any allergic substances and we hereby confirm that our film complies with 2000/13/EC, amended with 2003/89 EC, 2007/68/ EC.

4) Nanomaterial:

We declare that our PE stretch films have a composition that complies with Commission Recommendation 2011/696/EU on the definition of nanomaterial.

5) GMO (*Genetically Modified Organism*):

We confirm that our films manufactured from starting substances or additives which are not in grade genetically modified organism.

6) OTHER ABSENCES:

We declare that in the recipes of films are not intentionally added the substances listed below:

- Acetaldehyde
- Acetyl acetone
- Active and intelligent materials and article
- Acryl amide
- Acrylonitrile
- Alkyl benzenes
- Alkyl phenols (APs)
- Alkyl tin derivatives
- Ammonia
- Anthraquinone
- Antimony
- Antimony trioxide
- Aromatic amines
- Asbestos
- Arsenic
- Asbestos
- Azo colorants
- Azo compounds
- Azodicarbonamide
- Benzene
- Benzidine
- Benzoic acid
- Benzophenone
- Benzotrile
- Benzyl butyl phthalate
- Benzyl Phenol
- Bisphenol-F (BPF)
- bisphenol F diglycidyl ether (BFDGE)
- Bisphenol-S (BPS)
- Black Carbon
- Brominated flame retardants
- Bumetizole
- Butyl benzoate
- Butylated Hydroxyanisole (BHA)
- Butylated Hydroxytoluene (BHT)
- Carbon black
- Carcinogenic and mutagenic compounds
- Chlorine
- Chloroalkanes
- Chlorobenzenes
- Chlorofluorocarbons (CFC)
- Chlorophenols (TCP-PCP)
- Chloropropanols
- Cholecalciferol CAS N° 200-673-2
- CMR substances
- CRM compounds
- DEAB (= 4,4'- Bis(diethylamino)benzophenone)
- Dibutyl phthalate
- Di(ethylhexyl) adipate (DEHA)
- Di(ethylhexyl) maleate (DEHM)
- Di-isopropyl naphthalenes (DIPN)
- Diantimony trioxide

- Biocides
- Bisphenol-A (BPA)
- Bisphenol A diglycidyl ether (BADGE)
- Bisphenol-B (BPB)
- Biphenyl-4-ylamine
- Dioxins
- Disodium metasilicate
- Epichlorhydrin (ECH)
- Epoxidised Soya Bean Oil (ESBO)
- Epoxy derivatives
- Ethers de glycol
- Ethyleneimine
- Ethyl benzene
- Ethyl benzoate
- Formaldehyde
- Glycol ethers
- Glyoxal Heavy metals-based pigments
- Heavy metals including Aluminum, Barium, Cobalt, Copper, Iron, Lithium, Manganese, and Zinc
- 2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol
- Hexabromocyclododecane (HBCDD)
- Hexamethylenetetramine
- Hydroquinone
- Linear Alkylbenzenes
- Mancozeb CAS number 8018-01-7
- Melamine
- MEK (Methyl Ethyl Ketone or 2- butanone)
- MIBK (Methyl Isobutyl Ketone)
- Michler's ketone
- Mineral oils including:
 - POSH (polyolefinic oligomeric saturated hydrocarbons)
- MOAH (Mineral Oil Aromatic Hydrocarbon)
- MOSH (Mineral Oil Saturated Hydrocarbon)
- Nanoparticles
- NETSA (N-ethyl toluene sulfonamide)
- Nitrate
- Nitrite de sodium
- Nitrocellulose
- Nitrosamine (freenitrosamines, N- nitrosable substances)
- Nitrofurazone
- Nonylphenols
- Nonylphenol ethoxylate
- Nonylphenol and its derivatives
- novolac glycidyl ethers (NOGE)
- O-aminoazotoluene
- Diarsenic pentaoxide
- Diarsenic trioxide
- Dibutyl sebacate (DBS)
- 2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one
- Dimethyl Fumarate (DMF)
- Dinitrogen oxide
- Endocrine disrupting substances
- Organo-tin compounds:
 - Dibutyl-tin (DBT)
 - Monobutyl-tin (MBT)
 - Tributyl-tin (TBT)
- O-toluidine
- Oxygen absorbers
- p-(1,1-dimethylpropyl) phenol
- Palm Oil and its derivates
- Paraben
- Parachlorobenzotrifluoride (PCBTF)
- Paraffin wax CAS N° 8002-74-2
- Para-phenylenediamine (PPD)
- Pentabromodiphenyl ether
- Pentachlorophenol
- Pentachlorothiophenol (PCTP)
- per- and polyfluoroalkyl compound substances (PFAS)
- Perchlorate
- Perfluorinated tenside (PFT)
- Perfluorooctane sulfonate (PFOS)
- Perfluorooctanoic acid (PFOA)
- Perfluorobutane sulfonic acid (PFBS)
- Phenanthrene
- phenols
- PhenylPhenole
- Photoinitiators
- Phthalates
- Plasticisers
- Poly (aromatic hydrocarbons)
- Polyacrylonitrile
- Polybrominated biphenyls (PBBs)
- Polybrominated diphenyl ethers (PBDEs)
- Polybrominated terphenyls (PBTs)
- Polycarbonate
- Polychloride dibenzo-p- furan (PCDF)
- Polychloride biphenyl (PCB)
- Polychloride dibenzo-p-dioxin (PCDD)
- Polychlorinated biphenyls (PCBs)
- Polychlorinated naphthalenes (PCNs)
- Polychlorinated diphenyl ethers (PCDEs)
- Polychlorinated terphenyls (PCTs)

- O-anisidine
- Octabromodiphenyl ether
- Octyl tin chemicals
- Optical brighteners
- Oligomerisation and alkylation reaction products of 2-phenylpropene and phenol
- Perchloric acid, salts
- Phthalates (including DEHP and DBP)
- Poly & Perfluoroalkyl substances
- Polyhydroxyalkanoates
- POSH (Polyolefin oligomeric saturated hydrocarbons)
- POPs (Persistent Organic Pollutants)
- Primary aromatic amines
- Rhodamine-based pigments
- Pyrene
- Recycled products by Regulation (EC) 2022/1616
- Salicylic acid (FCM No 121)
- Semi-carbazide compounds
- Silicic acid, sodium salt
- Sintered expanded polystyrene (EPS)
- Styrene
- Short chained chlorinated paraffins
- Sodium bromide
- Sodium fluoride
- Sodium metasilicate nonahydrate
- Sodium metasilicate pentahydrate
- Synthetic latex
- Radioactive substances, as defined by Directive 96/29/Euratom (In 1223/2009)
- Silicone
- Tertiary Butylhydroquinone (TBHQ)
- Toluene
- Thiobenzoate
- Thiuram mix
- Titanium Acetyl Acetone (TAA)
- Titanium Dioxide
- 2,4,6-tri-tert-butylphenol
- Tributyltin
- Trichloroethylene
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether)
- triphenyl phosphate CAS 115-86-6
- tri-o-cresyl phosphate CAS 78-30-8
- tri-m-cresyl phosphate CAS 563-04-2
- tri-p-cresyl phosphate CAS 78-32-0
- Tris(2-chloroethyl) phosphate (TCEP)
- Polycyclic aromatic hydrocarbons [PAHS (I.E Benzo(a)pyrene, benzo(a)anthracene, chrysene, benzo(b)fluoranthene)]
- Polyethylene Glycol (PEG)
- Polytrimethylene naphthalate (PTN)
- Polyglycolic acid (PGA)
- Polystyrene
- Polyvinyl Chloride
- Polylactic acid
- Polycarbonates
- 2,4-Pentanedione with CAS number 123-54-6
- 2-Isopropylthioxanthone (ITX) with CAS number 5495-84-1
- 4-Methylbenzophenone with CAS number 134-84-9
- 6-amino-2-ethoxynaphthaline with CAS number 293733-21-8
- 4-amino-3-fluorophenol
- 4-aminoazobenzene with CAS number 60-09-3
- 4-chloroaniline with CAS number 106-47-8
- 4-chloro-o-toluidine with CAS number 95-69-2
- 3,3'-d-dichlorobenzidine with CAS number 91-94-1
- 3,3'-dimethoxybenzidine with CAS number 119-90-4
- 3,3'-dimethylbenzidine with CAS number 119-93-7
- 6-methoxy-m-toluidine with CAS number 120-71-8
- 4-methoxy-m-phenylenediamine with CAS number 615-05-4
- 4,4'-methylenebis(2-chloroaniline) with CAS number 101-14-4
- 4,4'-methylenedianiline with CAS number 101-77-9
- 4,4'-methylenedi-o-toluidine with CAS number 838-88-0
- 4-methyl-m-phenylenediamine with CAS number 95-80-7
- 2-naphthylamine with CAS number 91-59-8
- 5-nitro-o-toluidine with CAS number 99-55-8
- 4,4'-oxydianiline with CAS number 101-80-4
- 4,4'-thiodianiline with CAS number 139-65-1
- 2,4,5-trimethylaniline with CAS number 137-17-7
- 2,6-xylydine with CAS number 87-62-7
- 2,4-xylydine with CAS number 95-68-1

- Tris (4-nonylphenyl, branched and linear) phosphite (TNPP)
- Tris(nonylphenyl)phosphite
- Toluene
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- Untreated wood flour or fibres from a specific wood:
 - FCM No. 1080 (triethanolamineperchlorate, sodium salt)
 - FCM No. 1081 (N, N-bis (2-hydroxyethyl) stearylamine partially esterified with saturated C16/C18 fatty acids)
 - FCM No. 1082 (Phosphoric acid, mixed esters with 2-hydroxyethyl methacrylate)
 - FCM No. 1083 (BTDA)
- Vinyl acetate
- Vinyl chloride monomer (VCM) and its polymers or copolymers:
 - Polyvinylidene chloride (PVDC)
 - Chlorinated polyvinyl chloride (CPVC)
 - Vinyl chloride monomer (VCM)
 - Vinyl chloride polymer (PVC)
 - Vinylidene Chloride (VDC)
 - Vinyl chloride
 - Xylene
 - Zinc di(acetate)
 - 1-3 Butadiene with CAS number 106-99-0
- All the chemicals found in the EUPIA exclusion list:

• Titanium	• Thallium
• Lithium	• Beryllium
• Iron	• Tin
• Silicium	• Lead
• Chromium	• Barium
• Zinc	• Cobalt
• Copper	• Chromium VI
• Manganese	• Polychlorobiphenyls (PCBs)
• Nickel	

REACH / SVHC:

We hereby declare that our products fully comply with the European Union's Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH).

- Our products do not contain any of the Substances of Very High Concern (SVHC) above the specified concentrations, as defined in Article 57 and Annex XIV (including all amendments).
- Our products do not contain any of the restricted substances, as defined in Article 67 and Annex XVII (including all amendments).

RECYCLABILITY:

PE stretch films can be recycled.

Specification of the intended use or restrictions:

- ❖ Foodstuffs can be put in contact with these films by considering PE stretch film specifications.
- ❖ Customers must check that our films are safe and technically suitable in their applications.

➤ *This Declaration is valid starting from the issue date, and will be modified in the case of significant modification in our products formula structure or in the case of legislation amendments.*