

Date: 30/04/2025

DECLARATION OF COMPLIANCE

We, Polinas Plastik Sanayi ve Ticaret A.Ş., hereby declare that **POLINAS BOPP** films comply with the following legislations,

- A. EU :** Regulation 1935/2004/EC and its amendment including EU 2019/1381
- B.** Regulation 2023/2006/EC,
- C.** Commission Regulation EU 10/2011 and its successive amendments including EU 2025/351
- D.** Regulation 2025/40 on packaging and packaging waste amending Regulation EU 2019/1020 and Directive EU 2019/904, and repealing Directive 94/62/EC
- E. USA :** American 21 CFR 174.5 (GMP for food contact materials and articles intended to come into contact with food)
- F.** FDA Section 21 CFR Ch. 177.1520 and 176.170
- G. TR :** Türk Gıda Kodeksi Gıda İle Temas Eden Plastik Madde Ve Malzemeler Tebliği (Tebliğ No: 2019/44 – 2023/33 – 06.05.2024 tarih ve 32538 Sayılı Resmi Gazete)
- H. China:**
 - GB 4806.7-2023 - National Food Safety Standard - Food Contact Plastics
 - GB 31604.1-2023 - National Food Safety Standard-General Principles for Food Contact Materials Migration Tests.
 - GB 31604.59-2023 - National Food Safety Standard – Genral Principles for Validation of Chemical Analysis Methods for Food contact Materials and Products.
- İ. MERCOSUR**

All materials and/or raw materials used are in accordance with the requirements listed in:

 - a. MERCOSUR / GMC / RES No. 03/92. General criteria for food packaging and equipment in food contact.
 - b. MERCOSUR / GMC / RES No. 20/21. Modification of GMC Resolution No. 56/92 General provisions for plastic containers and equipment in contact with food
 - c. MERCOSUR / GMC / RES No. 28/99. Technical regulation on the positive list for packaging and elastomeric equipment in food contact.
 - d. MERCOSUR / GMC / RES No. 02/12. Technical regulation on the positive list of Monomers, other starting substances and authorized polymers for the production of plastic containers and equipment in food contact.
 - e. MERCOSUR / GMC / RES N ° 39/19. Technical regulation on positive list of additives for plastic materials destined to the elaboration of containers and equipment in food contact
 - f. MERCOSUR / GMC / RES N ° 15/10 Technical Regulation on Colorants in food contact plastic packaging and equipment
- J. Japan:** Food Sanitation Law and Japanese (MHLW) Positive List of 1st June 2025
- K. Swiss** Ordinance on materials and articles in contact with food (sr 817.023.21)
- L. Germany:** BfR-Empfehlung VII Polypropylen, Stand 01.06.2019
- M. Italy:** D.P.R: 777/82 and D.M. 21/3/73 and amendments and changes,

N. France: Brochure n° 1227.

Polinas films are intended for single use only. Our films were not tested for repeated contact usages.

OVERALL MIGRATION LIMITS:

We confirm that to produce our films listed, we use only monomers, starting substances and additives listed in the Union List of Authorized Substances of EU 10/2011 and its successive amendments including **EU 2023/1627**

All polymers and additives in the composition of above-mentioned films appear in the positive list of products accepted for the fabrication of packaging materials intended for food contact, as published by the Food and Drug Administration (USA) FDA 21 CFR 177.1520(c)1.1a (Polyolefins)

Films were tested according to latest directives (EU 10/2011) in the following simulants to obtain overall migration values for all food types.

EU 10/2011:

Solution		Conditions
10% Ethyl alcohol solution	Simulant A	60°C / 10 days
3% Acetic acid solution	Simulant B	60°C / 10 days
Vegetable oil	Simulant D2	60°C / 10 days

Results of the tests are available upon request.

SPECIFIC MIGRATION LIMITS:

During the production of our BOPP films, we use the following additives which are included in the Union List of Authorized Monomers and other starting substances in Annex I of EC Directive 10/2011 and its successive amendments including 2023/1627. The theoretical calculation method was used according to EC directive of 10/2011 to find the level of specific migrations for the compounds below.

Heat Sealable films FCM-PM ref Numbers	SML / SML (T) (mg/kg)	Measured content (mg/kg)	Calculated amount (mg/kg)
19-39090	1,2	0,104	
20-39120	1,2	<0,003	
760-83595	18		<10 ⁻²
185-20440	0,05	<0,003	
156-21130	6	<0,003	
610-93440	-(only on white films)		
496-71680			<10 ⁻⁴
671-74240			<10 ⁻⁴

Non Heat Sealable films			
19-39090	1,2	<0,5	
20-39120	1,2	<0,5	
661-95360	5		< 10 ⁻²

Polinas Plastik San. ve Tic. A.Ş.

610-93440	-(only on white films)		
496-71680			<10 ⁻⁴
671-74240			<10 ⁻⁴

Cavitated films			
19-39090	1,2	0,192	
20-39120	1,2	<0,003	
661-95360	5		<10 ⁻²
779-39815	0,05	<0,003	
610-93440	-		
496-71680			<10 ⁻⁴
671-74240			<10 ⁻⁴

Metallized films *			
19-39090	1,2	<0,5	
20-39120	1,2	<0,5	
661-9536	5		<10 ⁻²
496-71680			<10 ⁻⁴
610-93440*	-		
671-74240			<10 ⁻⁴

*only in cavitated metallized films

Antifog films			
19-39090	1,2	<1	
20-39120	1,2	<0,003	
165-21130	6	<0,003	
760-83595	18		<10 ⁻²
808-38550	5	<0,5	
185-20440	0,05	<0,003	
496-71680			<10 ⁻⁴
671-74240			<10 ⁻⁴

Results of the tests are available upon request.

Surface Volume ratio = 6 dm²/kg food

* For metallized films : This results are for non-metallized side of the film. Metallized surface should not be in contact with foodstuffs.

DUAL USE ADDITIVES:

Our films **may contain** following food additives. We confirm that the migration of those dual use additives are in the limits of our overall migration limits.

Chemical Name	E Number
Mono/diglycerides of fatty acids	E471
Silicon dioxide	E551
Polydimethylsiloxane	E900
Calcium carbonate	E170
Calcium Salts of fatty acids	E470a

Polinas Plastik San. ve Tic. A.Ş.

Magnesium salts of fatty acids	E470b
Citric acid	E330

HEAVY METALS:

The raw materials used in the production of said OPP films, namely: PP homopolymers, PP copolymers, PP terpolymers, and masterbatches based on the above-mentioned resins do not contain heavy metals such as cadmium, hexavalent chromium, lead, antimony, nickel, tin, arsenic and mercury, as declared by the suppliers of the above-mentioned raw materials.

Neither the said heavy metals nor their compounds are intentionally added during the production of the said OPP films, nor they are used, directly or indirectly, in the production process itself.

Any incidental amount of heavy metals contained does not exceed 100 ppm (by weight). For these reasons, we hereby declare that the said OPP films comply with the following regulations:

a. USA CONEG REGULATION**b. 2009/48/EC (Safety of toys) and its amendment EU 2021/903****c. Regulation 2025/40 on packaging and packaging waste amending Regulation EU 2019/1020 and Directive EU 2019/904, and repealing Directive 94/62/EC****d. ROHS Regulation (EU 2011/65) and its amendment EU 2023/1526****e. WEEE Regulation (EU 2012/19)****SPECIFIC MIGRATION OF HEAVY METALS:**

Specific migration analysis of *aluminum, ammonium, antimony, arsenic, barium, cadmium, calcium, chromium, cobalt, copper, europium, iron, gadolinium, mercury, lanthanum, lead, lithium, magnesium, manganese, nickel, potassium, sodium, terbium, zinc* in the table 1 of Annex II of EC Directive 2020/1245 were tested in the simulant of 3% acetic acid solution (Simulant B, 10 days @ 60 °C). Test results comply with the table 1 of Annex II. Results are available upon request.

SPECIFIC MIGRATION OF PRIMARY AROMATIC AMINES:

Specific migration of 22 Primary aromatic amines mentioned in EU 2020/1245 were tested in the simulant of 3% acetic acid solution (Simulant B, 10 days @ 60 °C). Test results comply with the relevant regulation. Results are available upon request.

GMP:

Polinas operates in conformity to the Good Practices of Manufacture according to European Regulation 2023/2006/CE, American FDA regulation 21 CFR 174.5

FDA:

All BOPP films produced at Polinas can be used for food contact material according to Title 21 of the Code of Federal Regulations of the FDA. Our films can be used in contact with all types of foods from "I-IX" as shown in Table 1 of 21 CFR 176.170(c) and under the conditions of use of "D to H" as shown in Table 2 of 21 CFR 176.170(c).

Polinas Plastik San. ve Tic. A.Ş.

GMO – DIOXINE – RESTRICTIONS-ALLERGENS – RECYCLED RAW MATERIAL USAGE:

According to the information received from our suppliers the additives and PP homopolymers, terpolymers and coating materials used to produce said films do not contain any genetically modified organisms (GMO)

EC 2003/11 (restrictions on the marketing and use of certain dangerous substances and preparations): please refer absence list given below.

EC 1895/2005 (restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food): please refer absence list given below.

EU 252/2012 (related with dioxine and dioxine related PCB's in the food chain) is not applicable to our products.

Our films do not contain any allergic substances and we hereby confirm that our film complies with **EU 1169/2011** and its amendments.

Polinas films are produced only from virgin resin and do not contain post-consumer recycled components, and no obligation exists under the **EU 2022/1616**.

Our films do not contain nanoparticles, so **EU 2011/696** is inapplicable.

Our films do not contain Active and intelligent additives, so **EC/450/2009** is inapplicable.

Our films do not contain biocides, so **EU 528/2012** is inapplicable.

Our films do not contain Bisphenol A, and comply with Commission Regulation (EU) **2024/3190**.

RECYCLING:

BOPP films can be recycled.

GENOTOXICITY:

In accordance with the requirements of Regulation 10/2011/EC, Annex IV, part 6, OUR BOPP films do not contain genotoxic substances which would migrate from a final material at a level exceeding 0.15 ppb in food or food simulant.

ABSENCE OF SUBSTANCES:

The raw materials used in the production of said OPP films do not contain the following substances, as declared by the relevant raw materials suppliers:

*Latex, **Bisphenol A**, S, F, AP, AF, B, BP, C, E, G, M, P, PH, TMC, Z", BHT, BHA, Polychlorinated biphenyls, 2-Ethylhexyl Acrylate, Polychlorinated naphthalates, Chlorinated Paraffins, Polybrominated biphenyls, Polybrominated diphenylethers, Organic Tin Compounds (tributyl or triphenyl tin), Asbestos, Azo Compounds, Formaldehyde, Mirex (perchloredecone), Alkyl Phenols – Octyl & Nonyl, Alkyl Phenol Ethoxylates, , CFC, HCFC, Triclosan, PVC, PVDC, Acrylamide, Dioxin etc, BADGE, BFGDE, NOGE, Melamine, Ammeline, TXIB , PCDD (polychloride dibenzo-p-dioxin), PCDF (polychloride dibenzo-p-furan), PCB (Polychloride biphenyl), **PAH (Polycyclic aromatic hydrocarbon)**, SCCP (Chlorinated paraffin short chain), HCH (Hexachlorocyclohexane), Hexabromocyclododecane (HBCD), PCP (Pentachlorophenol), Semicarbazide, Adipates, ESBO (Epoxidised Soybean Oil), Cyanuric acid, Dimethylfumarate, Isocyanates, Titanium Acetyl Acetate (TAA), 2-4 pentandione, pentabromodiphenyl ether, octabromo-diphenyl ether, halogenated compounds, conflict minerals (gold, wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tin, tungsten, and tantalum), active and intelligent substances, endocrine disruptors, ozone depleting substances, PFOA (perfluorooctanoic acid), PFOS (perfluorooctane sulfonate), nano particles, Perfluoroalkyl and Polyfluoroalkyl substances*

Polinas Plastik San. ve Tic. A.Ş.

(PFAS), MOAH/MOSH/POSH, melamine, glycol ethers, polycarbonate, Fluorocarbons, nitrosamine

Neither the said substances are intentionally added during the production of the said OPP films, nor they are used, directly or indirectly, in the production process itself.

We also would like to emphasize that we did not tested the films for such substances.

ENDOCRINE DISRUPTORS

We, Polinas Plastik Sanayi ve Ticareti A.S., hereby declare that the raw materials used in the production of the BOPP films do not contain substances given in SINLIST substances (can be reached <https://sinlist.chemsec.org/endocrine-disruptors/>) as declared by the relevant raw material suppliers.

PHTHALATES;

We hereby state that no phthalates of whichever chemical form are intentionally added as modifiers, plasticizers additives, or processing aids to BOPP films produced by Polinas.

In fact, Polypropylene films and BOPP in particular, do not need phthalates as modifier, plasticizer, additive, or processing aid. Phthalates in general, are peculiar modifiers, plasticizers, additives, or processing aids of plastics materials totally different from polypropylene. Even in the case of such (different) plastics materials, the food contact legislation allows anyhow the use of certain phthalates in food contact, stating in certain cases SML for their use.

During the production of catalysts for PP, Dibutyl phthalate (DBP) Diisobutyl phthalate (DIBP) or Bis(2-ethylhexyl) phthalate (DEHP) may be used to improve the efficiency of the catalyst and those are essential for the control of isotacticity of polymer and therefore has major impact on mechanical properties of the final product.

If completely surviving the polymerization process, the used phthalates could theoretically be present in concentrations of about 1 mg/kg in the final pellets. However, test results have shown phthalate values not exceeding 0,15 mg/kg PP and often even below the threshold of the analytical method of 0,01 mg//kg PP.

The potential residual traces of phthalates in polypropylenes are decades below the limits defined by REACH (0,1 wt%), thus no commercial polypropylene is subject to any restriction or ban in that respect.

The sunset date for these phthalates in 2015 does not prohibit the import or use of any products containing them in concentrations below 0.1 wt%.

As a reference, one of our films has been tested for DBP and DEHP in simulants A, B and D2 at 60C, 10 days. Results for those phthalates shown that it is well below the measurable limit of 0,1 mg/kg.

The following phthalates are absent in our film.

Di(2-ethylhexyl) phthalate, n-butyl benzyl phthalate Octyl & Nonyl phthalates, Butyl Benzyl Phthalate, Diisodecylphthalate, Diisononylphthalate, Diisooctylphthalate, Dioctyl phthalate,

Polinas Plastik San. ve Tic. A.Ş.

Chemical List of Proposition 65:

We certify that during the production of our films, we do not use or intentionally incorporate into them, any of the chemicals as restricted by Chemical Lists of Proposition 65 of the State of California and subsequent amendments. Complete list can be downloaded from,

[December 29, 2023 List of Proposition 65 chemicals](#)

NIAS:

Non-intentionally added substances (NIAS) is that the substances are not added intentionally during the production. They may be present as impurities, reaction intermediates, decomposition or reaction products.

The legislators/law makers like FDA and EC / European Food Safety Authority (EFSA) do not specify the test method for NIAS. It means there is no 'STANDARD TEST METHOD' for NIAS risk assessment.

Research Institutes like Fraunhofer, Rapra and the laboratories like CSI, Campden, SGS have no specified test method for NIAS risk assessment. Film or injection grade homopolymer / terpolymer producers in the world (polypropylene, polyethylene, polyester, polystyrene, etc.) have no risk assessment test method.

Even the NIAS subject is studied for almost 15 years, the technique cannot be defined by neither legislators/law makers nor the research institutes/laboratories. To identify NIAS substances, all substances in the film are extracted by using a solvent. Then the solvent is analyzed by instrumental method to define the substances.

Because of there is no standard test method and solvent, different solvents and test methods are used to identify the NIAS substances. Depends on these differences, the results are different for each technique.

For all these reasons, NIAS still is a difficult subject.

We, Polinas Plastik Sanayii ve Ticaret A.Ş., make two different laboratories do risk assessment. NIAS substances in some of Polinas BOPP and BOPET Films have been identified by using qualitative and quantitative test method. Some of the substances are listed on EU 10/2011 and some of them are not.

The amount of NIAS substances which is not seen in EU 10/2011 list, that may be accepted as 'non-authorized' or 'non-listed', in the said OPP and BOPET films. The migration amount may be calculated by using worst case scenario and should be < 0,01 mg to 1 kg food (The detection limit for non-authorized or non-listed substances acc to EU 10/2011).

We declare that NIAS substances in Polinas BOPP and BOPET Films do not exceed the limit value. The said films are also analyzed for the toxicological evaluation by means of Cramer Classifications. The films have no substance which is classified in Cramer Toxicology Class.

REACH:

Under the REACH regulation, all the products of POLINAS (plastics films) are manufactured items obtained from polymers, and so exempted from REACH registration. (including February 16th update)



Polinas Plastik San. ve Tic. A.Ş.

POLINAS have taken all the necessary steps to ensure that the chemical components from which POLINAS' products are obtained fulfill the obligation of the REACH registration, with specific requests of declarations from POLINAS' raw material suppliers.

Raw material suppliers to POLINAS are:

- Producers of Polymers
- Producers of Polymer Masterbatches (admixtures of Polymers and other components)

Polymers are exempted from the provisions of registration of Title II of REACH (Article 2(9)).

Polymer Masterbatches are considered, in regulatory terms, "preparations", and are exempted from the provisions of registration.

Nevertheless, the obligation of registration of the individual chemical substances used by the raw material suppliers to POLINAS (Producers of Polymers and Producers of Polymer Masterbatches) goes down in the supply chain to the obliged parties that supply the base chemicals and monomers (namely; propylene monomer) to the Producers of Polymers and Producers of Polymer Masterbatches that are the present suppliers to POLINAS.

SVHC:

Our BOPP, BOPET, CPP, Coated and Barrier Films do not contain in their composition more than 0,1% (w/w) concentration of the substances listed in SVHC (substances very high concern), which is updated regularly by ECHA.

HALAL/KOSHER STATUS:

Polinas cannot get a certificate from raw material suppliers that their products are Halal. Some of our raw material suppliers are also using animal derived products and they cannot distinguish and trace the type of animal. Since we cannot get these certificates and trace the source of any animal derived substance we are unable to declare Halal/Kosher certificate.

We do not recommend our films to be used for pharmaceutical applications.

DISCLAIMER

When our films are converted, since conversion activity is out of Polinas's control, it is our customers responsibility to assure regulatory compliance, recyclability and suitability for food contact. Polinas does not give any warranty/guaranty and do not accept responsibility for converted products about food contact compliance.

Ümit Sancar
Polinas R&D



Polinas

Polinas Plastik San. ve Tic. A.Ş.

