

Monday, 6<sup>th</sup> October 2025

## Certificate of compliance – EU food legislation

We, the Manufacturing Sites of Amcor’s Rigid Packaging Solutions International Business Group specified in Annex 1 (hereinafter referred to as “Amcor RPSI Manufacturing Sites” or “We”), hereby warrant that our products delivered are in accordance with the data sheet for the product provided. All products are suitable for food applications excluding:

**6085, 993, 6769, 981, 996**  
**577, 541, 765, 772, 4547, 552, 9255, 177 (gasket versions only)**  
**products in colours: 255, 375, 475, 523, 575, 577, 941**

### Compliance:

We further warrant that our products comply with the European Union Commission legislation, with all relevant amendments, listed below:

- Regulation EC No. 1935/2004 on materials and articles intended to come into contact with food
- Regulation EU No. 10/2011: “Plastic materials and articles intended to come into contact with food”.
- Regulation 2023/2006 on rules of Good Manufacturing Practice
- Directive 94/62 on packaging and packaging waste

– together the “Applicable EU Legislation”

The compliance is verified by overall migration testing at an accredited laboratory under the following conditions:

Simulants	Test conditions
3 % acetic acid	10 days at 40°C
50% ethanol	10 days at 40°C
Olive oil	10 days at 40°C

The overall migration testing is performed according to method EN1186.

For substances with SML (specific migration limits) values, these are verified by specific migration testing. Test conditions dependent on actual substance. Specific migration testing is performed according to EN13130.

If information on dual use substances, OML or SML values or volume/surface ratio in the individual products is required please contact us.

### Product suitability:

The products are suitable for all food types and for any long term storage at room temperature or below, including hot-fill conditions and/or heating/ microwaving up to  $70\text{ °C} \leq T \leq 100\text{ °C}$  for maximum  $t = 120/2^{((T-70)/10)}$  minutes. Following this equation: at  $T = 70\text{ °C}$  time of contact is 2 hours, at  $T = 80\text{ °C}$  is 1 hour, at  $T = 90\text{ °C}$  is 30 minutes.

Polypropylene used for production of our goods is suitable for heat treatment, but plastic packaging made of polypropylene in general become flexible when subjected to hot temperatures. Care must be taken in relation to stacking immediately after hot filling or microwaving.

**REACH:**

Our products are produced from virgin polypropylene polymers, clear or with addition of masterbatches, IML's, other labels and inks supplied to us by our suppliers.

As downstream users of these articles it is our responsibility that these articles meet the requirements of the so-called REACH legislation (Registration, Evaluation, Authorization, and restriction of Chemicals, 1907/2006 EC with all amendments).

Based on confirmations received from our suppliers we hereby confirm that:

- all substances covered by REACH Regulation and used in materials supplied to us has been registered
- no substances listed in the ECHA candidate list of Substances of Very High Concern (SVHC) for authorization updated on the 25 June 2025 are present above 0,1 % by weight in our products.

**Use of colourants in plastic materials in contact with food**

We hereby confirm that according to the information provided by our suppliers, all colourants we use in the production process comply with Resolution AP (89) 1.

**Nanotechnology:**

We hereby confirm that products produced at any factory of the Amcor RPSI Manufacturing Sites are produced without the use of nanoparticles and with no use of nanotechnology.

**Materials of animal origin - BSE/TSE**

We hereby inform that, according to information provided by our suppliers, raw materials we are using can be synthesized from animal by-products, i.e. hydrolysis etc. of animal fats and oils into fatty acids. However, the manufacturing process of tallow derivatives includes a multistep chemical treatment involving high temperatures and long residence times. Therefore, it fulfills requirements laid down in Regulations 1069/2009/EC, 142/2011/EC, and the "Note for Guidance EMEA/410/01, rev. 3".

**Convention on International Trade in Endangered Species of Wild Fauna and Flora**

According to the information provided by our suppliers, raw materials we are using to manufacture our products do not contain any substances derived from any endangered species of fauna and flora.

**BPA, its salts and derivatives**

Bisphenol A (BPA), its salts and derivatives are not used in production of our raw materials and products.

**Phthalates:**

We have never intentionally used phthalates in the production of plastic packaging.

Some resin suppliers are using some phthalates in the catalyst system during their production and this may result in traces in the product.

The Amcor RPSI Manufacturing Sites Berry meets the requirements of EU 10/2011 and any subsequent amendments thereto. Consequently, we are working in collaboration with our suppliers to ensure that any possible trace of phthalates in our product do not exceed the limits stated in EU 10/2011.

#### **Gluten:**

We are not using gluten in our production of plastic packaging. We have evaluated the risk of gluten in our products. The conclusion is that the risk is negligible. None of our raw materials contains gluten and we do not allow eating (or drinking) in our production or warehouses.

#### **Mineral Oil**

We hereby confirm that mineral oil saturated hydrocarbons (MOSH) and mineral oil aromatic hydrocarbons (MOAH) may be present in our final product. However, concentrations are below the limit value suggested in the latest draft of German mineral oil ordinance from August 17th 2020. In addition to that our products are also compliant with French [Decree No. 2020-105 on the 'Fight Against Waste and the Circular](#).

#### **Nonylphenols**

We have never intentionally used nonylphenols in the production of plastic packaging.

We meet the requirements of EU Regulation 10/2011 and any subsequent amendments thereto. Consequently, we are only using monomers and additives listed in EU Regulation 10/2011.

#### **Chlorine:**

Generally, the printing ink industry uses low levels of chlorinated organic compounds in the production of printing ink in some colors. The chlorine is part of the synthesis route of the pigments and the chlorine ensures the required coloristic and fastness properties of the inks.

We are in continuous dialog with our suppliers of printing ink to reduce the levels of chlorine. Our ink suppliers do not use substances classified as critical, toxic or highly toxic by the EuPIA Exclusion List, nor do they use chlorinated compounds banned from use under the REACH Regulation (EC) No 1907/2006, Title VIII/Annex XVII.

We meet the requirements of EU Regulation 10/2011 and any subsequent amendments thereto. Consequently, we are on a continuous basis, in collaboration with our supplier's document that any possible trace of chlorine in our product does not migrate above the limits stated in EU Regulation 10/2011.

#### **Other chemicals:**

The chemical materials listed below are not intentionally used in the manufacture or the formulation of our products and are not expected to be present as we are primarily using polypropylene (PP) plastics and a smaller amount of high density polyethylene (HDPE), for all products, both of which are approved for food contact materials. However, our products have not been tested for these chemical materials:

- formaldehyde
- epoxidised soybean oil (ESBO)
- Melamine

**Packaging and packaging waste:**

We hereby warrant that our products comply with the European Union Committee Directive 94/62/CE with later amendments and that we meet the national requirements set on basis of these. Consequently, we are working on:

- reducing our impact on the environment
- reducing the production of waste
- increasing use of re-cycled material where appropriate

Further as part of complying with the Directive 94/62/CE the content of heavy metals (sum of lead, cadmium, mercury and hexavalent chromium) in our products is < 100 ppm.

The management of these requirements is integrated into our environmental management system based on the requirement of ISO14001 and the requirements of EN13430 – Requirements for packaging recoverable by material recycling and EN 13428 – Prevention by source reduction.

**Printing inks:**

The printing inks used by us are all in compliance with:

- Swiss Ordinance of the FDHA on Materials and Articles (817.023.21)
- EuPIA Guideline on Printing Ink applied to the non-food contact surface packaging materials and articles. The products are produced without intentionally added substances:
  - Mineral oils
  - Benzophenon
  - 4-Hydroxybenzophenon
  - 4-Methylbenzophenon
  - 2,2'-Dimethoxy-2-phenylacetophenon
  - 1-hydroxy-cyclohexyl phenyl ketone
  - 2,4-diethyl thioanthone (DETX)
  - 2-methyl-4'-(methylthio)-2-morpholinpropiophenone
  - Ethyl-4-dimethylaminobenzoate
  - Methyl-2-benzoylbenzoate

In accordance with the Applicable EU legislation it is the responsibility of the customer to ensure that the product supplied by the Amcor RPSI Manufacturing Sites are suitable for the intended use and that the use is in accordance with the relevant acts of law, statutory orders and other rules and regulations, including the said Directives.

Amcor RPSI Manufacturing Sites warrant full traceability of the products delivered throughout the manufacturing process.

Amcor RPSI Manufacturing Sites are as a minimum certified according to ISO 9001:2015 and BRC Packaging Materials.

The present certificate is valid for a period of one year starting from the date first above written.

If you have any questions you, please don't hesitate to contact us.

Yours sincerely,



**Michal Kaminski**  
**Divisional Regulatory Compliance Manager**

**Annex 1**

**Manufacturing Sites of Amcor's Rigid Packaging Solutions International Business Group:**

1. **Berry Superfos Balkan d.o.o.**  
Branilaca grada b.b., BA-75320 Gračanica , Bosnia and Herzegovina
2. **Berry Superfos Besançon S.A.S.**  
11, rue La Fayette CS 99401, F-25071 Besançon Cedex 9, France
3. **Berry Superfos La Genête S.A.S.**  
1B RD 975, CS 30011, F-71290 La Genête, France
4. **Berry Superfos Lubien sp. z o.o.**  
Kaliska 140, PL-87-840 Lubien Kujawski, Poland
5. **Berry Superfos Mullsjö AB**  
Box 96, S-565 22 Mullsjö/ Industrivägen 13, S-565 91 Mullsjö, Sweden
6. **Berry Superfos Pamplona s.a.**  
Poligono Industrial Comarca n1, Calle L, 14-16, 31160 Orcoyen (Navarra), Spain
7. **Berry Superfos Randers a/s**  
Haraldsvej 25, DK-8960 Randers SØ, Denmark
8. **Berry Superfos Wetteren NV**  
Industriepark Kwatrecht, Biezeweg 19, B-9230 Wetteren, Belgium