

**Declaration of Compliance
For RAP “HandRAP PP” Packaging
Intended for Direct Food Contact**



This declaration of compliance relates to the following products produced by Rapid Action Packaging Ltd (RAP) using our HandRAP PP Materials and Manufacturing Process:

HandRAP PP Pouches with External Board Fitment

These products are produced as follows:

- Polypropylene is unwound from a reel and folded in half so that the food contact surface is in contact with itself only.
- Boards printed with Low Migration Inks and Varnish are adhered to the Outside of the film with Hot Melt Adhesive. The printed side is on the outside.
- The folded film is heat sealed and cut to produce finished bags with a board fitment on the outside like a rigid label.

These products are suitable for packing dry or moist, fatty foodstuffs under frozen, chilled or ambient conditions. The packaging products are also suitable for hot fill for immediate sale, subject to testing by the customer.

These products have a shelf life of 12 month from Date of Manufacture

We confirm that these products comply with the following:

- European Commission **REGULATION (EC) No. 1935/2004** and relevant sections of United States **FDA Title 21** for all **Materials and articles intended to come into direct contact with food**
- European Commission **REGULATION 10/2011** **Plastics and Articles Intended to Come into Contact with Food**, including all amendments, up to and including, at the time of writing, 2020/1245/EU for plastic components of the pack.
- **Recommendation XXXVI of the German BfR** (formerly known as BgVV) for paper and board components.
- **Swiss Ordinance on Materials and Articles in Contact with Food SR 817.023.21** and **Nestle Requirements**, pertaining to permitted substances used in printing inks and coatings used on food packaging.
- European Commission **REGULATION (EC) No. 2023/2006** for Good Manufacturing Practice (GMP) as assured by the following:
 - **Independently Audited Quality System to ISO9001:2015.**
 - **Independently Audited Food Packaging Standards to the BRC/IoP Global Packaging Standard Category 1** (Direct Food Contact Products)
- European Commission **REGULATION (EC) No. 1907/2006 (REACH)** for all chemicals used in the manufacture of our materials and our processes.
- We can also confirm that no plastics or articles supplied by us contain SVHC's (Substances of Very High Concern) as defined in articles 57 and 59 of the REACH regulations at levels at or above 0.1%.

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- In addition to Food and Chemical safety, all our packaging is produced in compliance with **European Parliament and COUNCIL DIRECTIVE 94/62/EC** 1994 on Packaging and Packaging Waste, and all amendments, up to and including, at the time of writing, 2004/12/EC. This can be summarised as follows:
 - Weight is minimised.
 - Options for re-use or recycling are maximised.
 - Products are made only from materials which are suitable for energy production by incineration.
 - Heavy metals are below the levels set by the Directive.
- In addition to statutory compliance we also refer to other regulations and guidelines where these are relevant for assuring safety of our packaging including:
 - **EuPIA GUIDELINES** for Printing Inks for use on Food Packaging.
 - **EN 71** (Toy Safety Standard) which ensure inks do not contain heavy metals or toxic substances that could cause harm by accidental ingestion.
 - Government, Statutory & Industry Guidelines that may be issued from time to time in response to newly available information or specific incidents not directly covered by current European Law.

The above material is compliant with the relevant requirements of the Framework Regulations (EC) No 1935/2004 presuming further approvals processing the material(s) following Good Manufacturing Practice Regulation (EC) No 2023/2006.

In Europe, the case of incomplete compliance in one country, the product can, on the basis of its full compliance in at least one Member State of the European Union be used for direct food contact in all Member States according to Article 34-36 of the Treaty on the Functioning of the European Union (TTEU).

It is confirmed that the material meets the specified conditions under the current versions or the Swiss Federal Act on Foodstuffs and Utility Articles FSA SR 817.0 including the regulations issued on that basis.

It has been taken into account that Swiss legislations sometimes differs significantly from EU legislation; for example, Regulation SR817.023.21 contains specific regulations regarding printing inks and silicone.

RAP can confirm that all raw materials used in the production of inks, varnishes and adhesives are permitted substances as listed in annex 2 and annex 10 of SR817.023.21

Migration Information- In accordance with Article 12 of Commission Regulation (EU) 2011/10, the overall migration shall not exceed 10 mg/dm² from plastic materials and articles intended to come into contact with food. The BOPP film surface of our packs have been 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

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(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. Furthermore, we confirm that the internal film surface of our product has been assessed for all SML's and we do not exceed specific migration limits.

All migration results were assessed using the Standard EU cube surface-to-volume value of 6dm² /1kg food.

This certificate of conformity relates to the packaging as supplied by Rapid Action Packaging Ltd for its intended purpose, as identified to us by the purchaser. The food manufacturer must ensure that they carry out any additional testing or checks necessary to confirm suitability of the packaging for their specific food product and use, in accordance with all relevant laws and regulations, including any relevant taint or odour test with their product under the intended conditions of use.

For more information on regulatory compliance and migration data please refer to:

RAP HandRAP BOPP Regulatory Compliance R37 12_05_20

Signed on Behalf of Rapid Action Packaging Ltd

Date

A handwritten signature in black ink, appearing to read 'Kevin Vyse', is written over a dotted line.

22/01/2021

.....
Kevin Vyse – Head of Technical

All legislative requirements are reviewed on a quarterly (3 month) basis from issue date and DoC's will be updated accordingly and as required.

RAP are in continual communication with suppliers and trade bodies to keep abreast of legislative changes, and historically these are communicated ahead of implementation and do not tend change more than annually. Hence, a quarterly review presents low risk of legislative changes within the time period covered by this DoC.

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