



DECLARATION of COMPLIANCE

23.03.2023

We hereby confirm that the products we supply to you do meet the requirements put forward in the legal framework presented below.

1. DESCRIPTION OF MATERIALS AND ARTICLES

R-PET Lids

The identity of the materials, the articles, products from intermediate stages of manufacture or the substances intended for the manufacturing of those materials and articles: APET / RPET(post consumer)/ APET in ABA , 3 Layer Co-Ex Sheet PET sheet; transparent, white, black, orange

Substance Name	IUPAC Name	CAS Number	E Number
Polyethylene Terephthalate	Poly(ethylene terephthalate)	25038-59-9	924-655-5

2. INTENDED USES

Products listed above can be in contact with following food stuff:

All beverages

In following conditions of temperature and time*:

10 days at 40 C⁰

* It is the obligation of the recipient of this declaration to ensure that the packaging is suitable for aimed processing and downstream use circumstances.

3. LEGISLATION

We certify that these products fulfil the requirements on products intended for use in contact with food and packaging as described in:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (07.08.2009) and its amendments up to date of this document
- 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 (17.04.2008) and articles intended to come into contact with food and its amendments up to date of this statement
- Regulation (EC) No 10/2011 on plastic materials and articles intended to come into contact with food (29.08.2019) and its amendments up to date of this document
- Regulation (EU) 2016/1416 of 24 August 2016 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food
- Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food
- Commission Regulation (EU) 2017/752 of 28 April 2017 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food



- Commission Regulation (EU) 2023/1442 of 11 July 2023 amending Annex I to Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, as regards changes to substance authorisations and addition of new substances
- Nine (9) substances newly included in the Consultation List of Substances of Very High Concern (SVHC) published by European Chemicals Agency (ECHA) on and before Jan 17, 2023 regarding Regulation (EC) No 1907/2006 concerning the REACH
- Commission Regulation (EC) 2022/1616 of 15 September 2022 on recycled plastic materials and articles intended to come into contact with foods
- Directive 94/62/EC on packaging and packaging waste and its amendments up to date regarding the threshold limit of 100 ppm by weight of heavy metals
- Veterinary Services, Plant Health, Food and Feed Law (O.N. 27610/13.06.2010)- (O.N : 30616/5.12.2018) and its amendments up to date of this statement
- Regulation on Food Hygiene (O.N. 28145/17.12.2011) and its amendments up to date of this statement
- Turkish Food Codex Food Labeling and Consumer Information Regulation (O.N. 29960/26.01.2017) and its amendments up to date of this statement
- Property of Materials and Food Contact Regulation on Good Manufacturing Practice and Registration Procedures (O.N. 28373/03.08.2012)- (O.N : 28547/02.02.2013) and its amendments up to date of this statement
- Regulation on plastic materials and articles intended to come into contact with food (2019/44) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Regulation on the list of simulants used in migration test of plastic materials and articles intended to come into contact with food (2019/43) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Turkish Food Codex Regulation on Substances and Materials in contact with food (R.G. 30680 / 8.2.2019) and its amendments up to date of this statement
- Regulation on Registration and Approval Procedures of Food Businesses (R.G. 30825 / 08.07.2019) and its amendments up to date of this statement
- This material does contain intentionally incorporated dual use additive (E 338) which are subject to disclosure of adequate information as described in Annex VIa of Directive 2007/19/EC.
- The Regulation of Waste Control of Food Contact Materials

4. ANALYSES

According to Turkish Food Codex and Regulation (EU) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per dm² (60 mg/kg) foodstuff or food simulant (limiting value of overall migration) and specific migration limits shown below as mg/kg.

Following migration tests were conducted:

DETERMINATION of OVERALL MIGRATION						
FOOD TYPE	SIMULANT	TIME	TEMP.	METHOD	LOQ*	REQUIREMENT



		(h)	(C°)		(mg/kg)	
Acidic Food	Food Simulant B, Acetic Acid 3%	10 days	40	EN 1186-9	6	<=60 mg/kg
Aqueous Food	Food Simulant A, Ethanol 10%	10 days	40	EN 1186-9	6	<=60 mg/kg
Fatty Food	Food Simulant D1, Ethanol 50%	10 days	40	EN 1186-9	6	<=60 mg/kg
Alternative Simulant for fatty Food Simulant	Fatty Food Simulant , Ethanol 95%	10 days	40	EN 1186-14	6	<=60 mg/kg
Fatty Food Substituted Simulation	Isooctane	2 days	20	EN 1186-14	6	<=60 mg/kg

* LOQ: Limit of Quantification

DETERMINATION of SPECIFIC MIGRATION							
SUBSTANCE	CAS Number	SIMULANT	TIME (h)	TEMP. (C°)	SML REQUIREMENT (mg/kg)	METHOD	DETECTION LIMIT(mg/kg)
Manganase (Mn)	7439-96-5	Acetic acid 3%	10 days	40	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Copper (Cu)	7440-50-8	Acetic acid 3%	10 days	40	5 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Cobalt (Co)	7440-48-4	Acetic acid 3%	10 days	40	0.05 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Lithium (Li)	7439-93-2	Acetic acid 3%	10 days	40	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Zinc (Zn)	7440-66-6	Acetic acid 3%	10 days	40	5 (max.)	EN 13130-1 ISO 17294-1&2	0.010
Barium (Ba)	7440-39-3	Acetic acid 3%	10 days	40	1 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Iron (Fe)	7439-89-6	Acetic acid 3%	10 days	40	48 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Aluminum (Al)	7429-90-5	Acetic acid 3%	10 days	40	1 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Nickel (Ni)	7440-02-0	Acetic acid 3%	10 days	40	0.02 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Antimony (Sb)	7440-36-0	Acetic acid 3%	10 days	40	0.04 (max.)	EN 13130-1 ISO 17294-1&2	0.003
Arsenic (As)	7440-38-2	Acetic acid 3%	10 days	40	0.002 (ND)	EN 13130-1 ISO 17294-1&2	0.0002
Cadmium (Cd)	7440-43-9	Acetic acid 3%	10 days	40	0.002 (ND)	EN 13130-1 ISO 17294-1&2	0.0009
Lead (Pb)	7439-92-1	Acetic acid 3%	10 days	40	0.003 (ND)	EN 13130-1 ISO 17294-1&2	0.002



Mercury (Hg)	7439-97-6	Acetic acid 3%	10 days	40	0.007 (ND)	EN 13130-1 ISO 17294-1&2	0.0001
Europium (Eu)	7440-53-1	Acetic acid 3%	10 days	40	0.05 sum (max.)	EN 13130-1 ISO 17294-1&2	0.005
Gadolinium (Gd)	7440-54-2	Acetic acid 3%	10 days	40		EN 13130-1 ISO 17294-1&2	0.005
Lanthanum (La)	7439-91-0	Acetic acid 3%	10 days	40		EN 13130-1 ISO 17294-1&2	0.005
Terbium (Tb)	7440-27-9	Acetic acid 3%	10 days	40		EN 13130-1 ISO 17294-1&2	0.005
Chromium (Cr)#	7440-47-3	Acetic acid 3%	10 days	40	0.01 (ND)	EN 13130-1 ISO 17294-1&2	0.001
Magnesium (Mg)	7439-95-4	Acetic acid 3%	10 days	40	-	EN 13130-1 ISO 17294-1&2	0.003
Sodium (Na)	7440-23-5	Acetic acid 3%	10 days	40	-	EN 13130-1 ISO 17294-1&2	0.006

ND = Not detected

= When migration of total chromium is between 0.01 mg/kg and 3.6 mg/kg, chromium (VI) content in plastic shall be not detected

PAH CONTENT				
ANALYSIS NAME	CAS Number	METHOD	LOQ* (mg/kg)	REQUIREMENT
Sum of 18 PAH's	-	ZEK.01.4.08	0.2	<=10 mg/kg
Chrysene	218-01-9	ZEK.01.4.08	0.2	<=0,5 mg/kg
Dibenzo(a,h)anthracene	53-70-3	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(g,h,i) perylene	191-24-2	ZEK.01.4.08	0.2	<=0,5 mg/kg
Indeno (1,2,3-cd) pyrene	193-39-5	ZEK.01.4.08	0.2	<=0,5 mg/kg
Sum of Acenaphylene+ Acenaphthene+Fluorene+Phenanthrene+Pyrene+Anthracene+ Fluoranthene	-	ZEK.01.4.08	0.2	<=10 mg/kg
Napthalene	91-20-3	ZEK.01.4.08	0.2	<=2 mg/kg
Benzo(a) pyrene	50-32-8	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(e) pyrene	192-97-2	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(a) anthracene	56-55-3	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(b) fluoranthene	205-99-2	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(j) fluoranthene	205-82-3	ZEK.01.4.08	0.2	<=0,5 mg/kg
Benzo(k)fluoranthene	207-08-9	ZEK.01.4.08	0.2	<=0,5 mg/kg

* LOQ: Limit of Quantification

Lead, Cadmium, Mercury, Chromium +6 CONTENT				
ANALYSIS NAME	CAS Number	METHOD	LOQ* (mg/kg)	REQUIREMENT
Lead Content	7439-92-1	NMKL 186	0.009	-

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Cadmium Content	7440-43-9	NMKL 186	0.009	-
Mercury Content	7439-97-6	NMKL 186	0.01	-
Determination of Chromium +6	18540-29-9	ICP-MS	1	-
Sum of Lead, Cadmium, Mercury, Chromium (+6)	-	Calculation	1.03	100 mg/kg

* LOQ: Limit of Quantification

ANALYSIS NAME	CAS Number	TIME (h)	TEMP. (°C)	METHOD	LOQ* (mg/kg)	REQUIREMENT
Determination of Bisphenol A Migration, Aqueous Food Simulant	80-05-7 FCM No: 151	10 days	40	CEN/TS 13130-13 BS EN 14372 EN 14350-2	0.01	<=0,05 mg/kg
Butyl Benzyl Phthalate (BBP) Phthalate Acid Benzyl butyl ester	85-68-7 FCM No: 159	-	-	BS EN 14372	0.002 %	<=0,1 %
Di-n-Butyl Phthalate (DBP)	84-74-2 FCM No: 157	-	-	BS EN 14372	0.002 %	<=0,05 %
Di(Ethylhexyl) Phthalate (DEHP)	117-81-7 FCM No: 283	-	-	BS EN 14372	0.001 %	<=0,1 %
Di-Iso-Nonyl Phthalate (DINP)	28553-12-0 FCM No: 728	-	-	BS EN 14372	0.022 %	<=0,1 %
Di-Isodecyl Phthalate (DIDP)	26761-40-0 FCM No: 729	-	-	BS EN 14372	0.015 %	<=0,1 %

* LOQ: Limit of Quantification

SPECIFIC MIGRATION of PRIMARY AROMATIC AMINES (PAA)							
COMPOUND	CAS Number	SIMULANT	TIME (h)	TEMP. (°C)	METHOD	DETECTION LIMIT(mg/kg)	REQUIREMENT
4-Aminodiphenyl	92-67-1	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
Benzidine	92-87-5	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
4-Chloro-o-toluidine	95-69-2	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
2-Naphthylamine	91-59-8	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
o-Aminoazotoluene	97-56-3	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
2-Amino-4-nitrotoluene	99-55-8	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
p-Chloroaniline	106-47-8	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
2,4-Diaminoanisole	615-05-4	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND



4,4'-Diaminodiphenylmethane	101-77-9	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
3,3'-Dichlorobenzidine	91-94-1	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
3,3'-Dimethoxybenzidine	119-90-4	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
3,3'-Dimethylbenzidine	119-93-7	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
3,3'-Dimethyl-4,4'-diaminodiphenylmethane	838-88-0	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
p-Cresidine	120-71-8	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
4,4'-Methylene-bis(2-chloroaniline)	101-14-4	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
4,4'-Oxydianiline	101-80-4	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
4,4'-Thiodianiline	139-65-1	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
o-Toluidine	95-53-4	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
2,4-Toluylenediamine	95-80-7	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
2,4,5-Trimethylaniline	137-17-7	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
o-Anisidine	90-04-0	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
4-Aminoazobenzene	60-09-3	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
m-Phenylendiamine	108-45-2	Acetic acid 3%	10 days	40	EN24815 EN2011	0.002	ND
Benzoguanamin	91-76-9	Acetic acid 3%	10 days	40	EN24815 EN2011	0.05	5
4,4'-Methylenebis(3-chloro-2,6-diethylaniline)	106246-33-7	Acetic acid 3%	10 days	40	EN24815 EN2011	0.05	0.05
Total of other primary aromatic amines	-	Acetic acid 3%	10 days	40	EN24815 EN2011	0.010	0.010

Analysis Name: Specific migration of Primary Aromatic Amines (**PAA**)

Requirement: European Commission Regulation No. 10/2011 Annex II, Regulation No. 2016/1416, Regulation No. 2020/1245 and Regulation No. 1935/2004 –Specific Migration of Primary Aromatic Amines

Remark: **ND** = Not detected

SENSORY ANALYSIS		
ANALYSIS NAME	METHOD	REQUIREMENT

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Sensory Analysis	DIN 10955	<= 2
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No substances with a specific migration limit are used.

The calculations are based on the assumption that 1 kg of food comes into contact with 6 dm² of the packaging material.

Heavy metals: lead, cadmium, mercury and chromium is below the legal limit.

The limit value of 100 mg/kg is not exceeded.

5. OTHER ABSENT SUBSTANCES

Furthermore, we confirm that this compound is manufactured without the intentional use of the following substances:

OTHER ABSENT SUBSTANCES	CAS NO
2,2'-Dimethoxy-2-phenylacetophenone	24650-42-8
2,4-Pentadione (synonyme acetylacetone)	123-54-6
Acrylamide	79-06-1
Antimony trioxide	1309-64-4
Adipates	141-04-8
Adsorbable organically combined halogens (AOX)	106-48-9
Aromatic hydrocarbons (MOAH, "mineral oil aromatic hydrocarbons")	63231-51
Azo dyes	90-04-0
Benzophenone and 4-methylbenzophenone and their derivatives	119-61-9 / 134-84-9
Bisphenol A and its derivatives e.g. Bisphenol A diglycidyl ether (BADGE)	80-05-7
Bisphenol F and its derivatives e.g. Bisphenol F diglycidyl ether (BFDGE)	620-92-8
Bisphenol S and its derivatives	80-09-1
Brominated fire retardants	58965-66-5
Chain- and ring-shaped hydrocarbons (MOSH, "mineral oil saturated hydrocarbons")	Mineralöle MOSH/MOAH
Cobalt(II)-chloride (CAS 7646-79-9 (anhydrous))	7646-79-9 16544-92-6(dihydrate) 7791-13-1(hexahydrate)
Cyanuric acid (1,3,5-triazin-2,4,6-triol)	108-80-5 6202-04-6 (Dihydrate)
Dimethylfumarate (DMF)	624-49-7
Diphenyl-2-ethylhexylphosphate (DPO)	1241-94-7
Ethyl-4-dimethylaminobenzoate	10287-53-3
Elastomers or rubber from which n-nitrosamines may be released N-Nitroso-di-benzylamine(NDBzA) N-nitrosodibutylamin(NDBA) N-nitrosodiethanolamine(NDELA) N-Nitrosodiethylamine (NDEA) N-Nitrosodiisobutylamine(NDiBA) 3,5,5-trimetil-N-nitroso-N- (3,5,5-trimetilheksil) -1-heksanamin(NDİNA) N-Nitrodiisopropylamine(NDİPA)	5336-53-8 924-16-3 1116-54-7 55-18-5 997-95-5 1207995-62-7 601-77-4



N-Nitrosodimethylamine(NDMA)	62-75-9
N-Nitrosodi-n-propylamine(NDPA)	621-64-7
N-Nitrosomorpholine(NMOR)	59-89-2
N-Nitrosoethylphenylamine(NEPhA)	612-64-6
N-Nitroso-N-methylaniline(NMPhA)	614-00-6
N-Nitrosopiperidine(NPIP)	100-75-4
N-Nitrosodiethanolamine(NDELA)	1116-54-7
Epoxidised soybean oil (ESBO)	8013-07-8
Formaldehyde	50-00-0
Halogens	CAS group number VIIA
Primary aromatic amines	-
Isopropylthioxanthone (ITX)	83846-86-0
Latex	9006-04-6
Maleicacid-di-(2-ethylhexyl)-ester	142-16-5
Melamine	108-78-1
Novolac glycidyl ether (NOGE)	158163-01-0
Nanoparticles and -materials (< 100 nm)	7440-22-4
Palm oil	8002-75-3
Propil Parabens	94-13-3
Perfluorinated organic compounds & fluorinated surfactants	-
Perfluorooctanoic acid (PFOA)	335-67-1
Semicarbazide (SEM)	563-41-7
Titan-acetylacetonate (TAA)	14024-64-7
Tributyltin (TBT)	688-73-3
Tributyltin oxide (TBTO)	56-35-9
Tris(4-nonyl-phenyl) phosphite (TNPP)	26523-78-4
Triclosan	3380-34-5
Vinylchlori	75-01-4
Phenols & Phenylphenole	108-95-2 / 90-43-7
Phthalates	CAS number cannot be referred as there are many different compounds
Polycyclic aromatic hydrocarbons (PAHs)	CAS number cannot be referred as there are many different compounds

Monomers &Co-Monomers	CAS NO	SML
Purified Terephthalic Acid (PTA)	100-21-0	7.5 mg/kg
Mono Ethylene Glycol (MEG)	107-21-1	(MEG + DEG) SML: 30 mg/kg
Isophthalic Acid (IPA)	121-91-5	5 mg/kg
Diethylene Glycol (DEG)	111-46-6	(MEG + DEG) SML: 30 mg/kg
Antimony (Sb)	7440-36-0	0.04 mg/kg
Cobalt (Co)	7440-48-4	0.04 mg/kg
Manganase (Mn)	7439-96-5	0.6 mg/kg



- Non-intentionally added substances (NIAS) Under the legislation, overall migration limits of permitted substances are 60 mg/kg and unauthorized substances may be present in food contact materials, provided they do not migrate at levels above 0.01 mg of substance per kg of food. However, there is no common agreed test or methodology for NIAS evaluation. We have worked with our raw material suppliers to identify potential non evaluated substances (NES) that might be present in our products as NIAS. We have had products analyzed at an accredited laboratory for the presence of NIAS and NES. The testing has been conducted under foreseeable conditions of use, and it has been confirmed that the overall migration limit of 60 mg/kg of food was not exceeded by substances permitted under the applicable regulations. If present, NIAS and NES migrating, in amounts of more than the limiting value of 0.01 mg/kg, go through a risk assessment to confirm that the migratory of the substances in the foodstuff has an exposure below the limits and there is a low probability for adverse health effects.

The product meets the above requirements and poses no threat to human health provided that use it as intended.

6. TRACEABILITY

This can be done by referring to traceability by Box Label and/or box stamp which includes

Box Label: Product Code, Product Description, Production Date

Box Stamp: Production date and shift no.

This certificate is valid until there is significant changes in the composition or production that bring about changes in the migration from the materials or articles or when new scientific data becomes available.

İbrahim GÖNCAY
General Manager

