

# Declaration of Compliance

And

## General Absence Declaration



**KULLAPLAST AB**

Kullaplast AB frequently receives enquiries about our compliance with relevant legislation and many of these enquiries require an immediate response. In order to respond quickly and consistently to all our customers we have prepared this Declaration of Compliance.

Kullaplast AB produces polyethylene products for packaging and protection. These products, or the materials used in the production of the products, are subject to regulation per the Directives and Regulations listed below. Regarding the materials, we have received confirmations from our suppliers that their virgin materials do comply with the requirements applicable to our products. Consequently, we hereby declare that our products, made from virgin materials, complies with the regulations below, including amendments and corrections.

### **REACH – Registration, Evaluation, Authorisation and Restriction of Chemicals**

According to the REACH Regulation (EU 1907/2006), our products are defined as *articles*. This means “*an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition*”. Articles are excluded from registration according to REACH.

Regarding the chemical substances and mixtures that we use as virgin raw materials in our production we have been informed by our suppliers that they:

- Have received at least a pre-registration confirmation and a registration intention.
- Do not contain any substance included in the most recent and authentic “Candidate List of Substances of Very High Concern for Authorisation”, in a concentration above the threshold limit of 0.1%.
- Do not contain any substance included in the most recent version of REACH Annex XIV: List of substances subject to authorisation.
- Do not contain any substance included in the most recent version of REACH Annex XVII: Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles.

In addition to this, Kullaplast does not intentionally use or add any substance included in the lists above, to our products.

### **Material Safety Data Sheet (MSDS)**

As our products are defined as articles, and lack any inherent dangerous properties such as being persistent, toxic, or bioaccumulative, there is no legal obligation to set up a MSDS for our products according to the REACH and CLP (No 1272/2008) regulations.

## **Directives on End-of Live Vehicles (ELV), Waste Electrical and Electronic Equipment (WEEE), and Restriction of Hazardous Substances (RoHS)**

Our products are not in scope of Directive 2000/53/EC on End-of Live Vehicles (ELV) nor Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE). Thus, none of these directives, nor the Directive on the Restriction of Hazardous Substances (RoHS), applies to our products.

However, we have been informed by our suppliers that none of the virgin materials they supply to us contain any of the hazardous substances in the RoHS directive. These substances are: Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent chromium (Cr<sup>6+</sup>), Polybrominated biphenyls (PBB), and Polybrominated diphenyl ether (PBDE).

### **Packaging and packaging waste**

European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, and specifically Article 11, requires that the maximum concentration level of Lead (Pb), Mercury (Hg), Cadmium (Cd), and Hexavalent chromium (Cr<sup>6+</sup>), present in packaging or packaging components does not exceed 100 ppm by weight.

### **Dual-use items**

To the best of our knowledge our products are not included in “Council Regulation (EC) No 428/2009 of 5 May 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items”, including amendments and corrections.

### **CE marking**

Our flexible sheets for waterproofing (*Byggsfolie* in Swedish) are tested and approved by *SP Technical Research Institute of Sweden* (Notified Body, no 0402) according to *SP Certification rule CR 128 – Flexible sheets for waterproofing*. Thus, these products fulfil the requirements of *Regulation (EU) No 305/2011* and bears the prescribed CE mark.

## **Food Contact Materials**

*The Declaration of Compliance below is only applicable for products intended for food contact!*

In addition to the Declaration of Compliance above, which is valid for all our products, we hereby declare the compliance with the following directives and regulations regarding food contact materials:

- Commission 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, including amendments and corrections

- 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, including amendments and corrections
- Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, including amendments and corrections
- Commission Regulation (EC) No 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods and amending Regulation (EC) No 2023/2006, including amendments and corrections
- Commission Regulation (EC) No 1895/2005 of 18 November 2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food, including amendments and corrections
- Commission Regulation (EC) No 450/2009 of 29 May 2009 on active and intelligent materials and articles intended to come into contact with food, including amendments and corrections

### *Regarding the use of Food Contact Materials – Normpack Certificate*

Food Contact Materials are intended for packaging and protection at room temperatures and below. Specifications can be found in our Normpack certificate, registration no 082 09 100 4642 33. No material or product is intended for heating, cooking, use in microwave ovens or similar.



### *Regarding Specific Migration Limits and Dual Use Additives*

Some of the materials used in the production of our products contain substances that are subjected to Specific Migration Limits (SML) or classified as Dual Use Additives. However, in our final products these substances are, if present at all, only present in quantities that in case of their migration does not amount to relevant contribution to exceed the limits as set in the applicable food legislation.

This have been established by the prescribed migration tests and is verified by our Normpack certificate, see paragraph above.

### *Regarding Storage*

The time/temperature conditions specified in our Normpack certificate are valid with regard to migration. Regarding mechanical properties of the plastic material, we recommend usage within two years. Storage must be done free from UV-radiation. Furthermore, storage should be done in a dry location, at a non-elevated temperature, and in a closed outer packaging.

### *Regarding printing inks*

The printing inks used by Kullaplast are manufactured and used according to the guidelines from the European Printing Inks Association (EuPIA), current version can be found at <http://www.eupia.org>, and are suitable for use on the non-contact side of food packaging.

## General Absence Declaration

Although the substances mentioned below are not intentionally used in our production or added to our products by us (and their absence has not been checked by tests), it does not exclude the presence of negligibly slight traces due to, amongst others, impurities in materials or components supplied by external parties.

- Allergens, examples include, without excluding any substance or food type not mentioned here: Gluten, Crustaceans, Molluscs, Egg, Fish, Peanuts, Soy, Milk incl. lactose, Almonds, Hazelnut, Walnut Cashew, Pecan, Brazil nut, Pistachio, Macadamia nut, Lupine, Celery, Mustard, Sesame seeds Sulphur dioxide, Sulphite
- Adipates
- Biocidal products
- Bisphenol A (BPA)
- Bovine spongiform encephalopathy (BSE)
- Cellulose
- CFCs and HCFCs
- Conflict Minerals. We have received confirmation from our suppliers that for the vast majority of our raw materials the following minerals and their derivatives are either not used in the production of our raw materials, or complies with the applicable regulations: Columbite-Tantalite, also known as Coltan (niobium, tantalum); Cassiterite (tin), Wolframite (tungsten), Gold
- Heavy metals, please refer to applicable legislations above
- Phthalates, examples include, without excluding any substance not mentioned here: butyl benzyl phthalate (BBP), di-n-butyl phthalate (DBP), diisobutyl phthalate (DIBP), di-(2-ethylhexyl) phthalate (DEHP).
- Polyvinylchloride (PVC)
- Radioactive substances
- Transmissible spongiform encephalopathy (TSE)

### Regarding the SIN List

The [SIN \(Substitute it Now!\) List](#) is a globally used database of chemicals likely to be banned or restricted in a near future. The chemicals on the SIN List have been identified by [ChemSec](#) as Substances of Very High Concern (SVHC) based on the criteria established by the EU chemicals regulation REACh. Thus, the SIN List is more comprehensive than the “Candidate List of SVHC for Authorisation”, please refer to the paragraph regarding REACh above.

Unfortunately, our suppliers do not issue statements regarding absence of chemicals included in the SIN List valid for their products, nor do they reveal the exact composition of their products. Consequently, Kullaplast does not have the information and knowledge to truthfully issue a statement regarding the absence of chemicals included in the SIN List valid for our products.

## General Information

### Product Data Sheets

All our products are accompanied by a Product Data Sheet (PDS) that specifies the product. As the vast majority of our products are made to the customer's specifications, the PDS are not available beforehand. PDS are distributed on demand.

### Storage

Storage must be done free from UV-radiation. Furthermore, storage should be done in a dry location, at a non-elevated temperature and in a closed outer packaging. Kullaplast recommends usage within two years.

### Regarding recycling

The clear majority of our products are made exclusively from polyethylene (PE); however, in a few products there is some polypropylene (PP). Thus, all our products are recyclable and should be recycled as polyethylene (PE) as this is the main component. If you require specific information on your product, please contact our Quality Manager.



*Thank you for caring about our environment!*

### Further or erroneous information

If you require further information regarding any of the subjects above, or if any information is missing or appears erroneous, please contact our Quality Manager.

### Disclaimer

To the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication; however, we do not assume any liability whatsoever for the accuracy and completeness of such information.

*Höganäs, Sweden, 2018-01-17*

  
Jonas Skoglund, CEO