DRAVA INTERNATIONAL d.o.o.
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DECLARATION OF COMPLIANCE

FOR MATERIALS AND ARTICLES INTENDED TO COME INTO CONTACT WITH FOOD

We hereby declare that the supplied material, PET trays, cups and lids, in various colours, shapes and dimensions, with or without pad

comply with all relevant regulations, and particularly with the following:

Regulation 1935 /2004/EC (incl. Article 3 (product safety), Article 11 (5) (authorization of new material), Article 15 (labeling) and Article 17 (traceability).

Regulation 10 /2011/ EC (conforming to Art. 13 sec. 2, 3 and 4) and corresponding annexes, including Commission 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 (in addition to the amendments to Regulation EU No 10/2011, which are No 321/2011, No 1282/2011, No 1183/2012, No 202/2014, No 865/2014, No 174/2015, No 1416/2016, No 752/2017, No 79/2018, No 213/2018, 831/2018, 37/2019, 1339/2019 and No 2020/1245), EU regulation 2022/1616 (regarding "functional barrier"), Regulation (EU) 2023/144, Regulation 2023/1627/CE, Regulations EU 2023/1435 and 2024/197

Regulation EC 2023/2006 and corresponding annexes.

The PET hinged food container meets the overall migration limit of 10 mg/dm² in compliance with Regulation (EU)No. 10/2011 in the food simulants 3% acetic acid, 10% ethanol and oil (Test report No. 2427893 by Dr. Graner & Partner GmbH laboratory.

PET film is produced as ABA PET film (made of PET and post consumer r-PET, where the layer in direct contact with the foodstuff (said functional barrier) is made of virgin PET in at least 30 microns thickness) in all produced thickness dimensions, and the minimum quantity of postconsumer material is 50%).

The product mentioned above contains the following substances with a specific migration limit.These limits were met by the tested product.

Specific migration in 3% acetic acid:

Name	Unit	Result	SML	LOQ	Method
Antimony trioxide	mg/kg	<LOQ	0,04 (calc. as Sb)	0,04	ICP-MS

Migration conditions: 1.75 dm¸/ 100 ml; 10 d 60 °C

Specific migration of metals:

Conditions	10 d, 60 °C; 1.75 dm² / 100 ml; 3 % Acetic acid				
	Content	Unit	LOQ	SML	Method
Migration of metals:					
Aluminium	< LOQ	mg/kg	0.25	1	ICP-MS
Antimony	< LOQ	mg/kg	0.04	0.04	ICP-MS
Arsenic	< LOQ	mg/kg	0.01	0.01	ICP-MS
Barium	< LOQ	mg/kg	0.2	1	ICP-MS
Cadmium	< LOQ	mg/kg	0.002	0.002	ICP-MS
Chromium	< LOQ	mg/kg	0.01	0.01	ICP-MS
Cobalt	< LOQ	mg/kg	0.01	0.05	ICP-MS
Copper	< LOQ	mg/kg	0.1	5	ICP-MS
Iron	< LOQ	mg/kg	0.1	48	ICP-MS
Lead	< LOQ	mg/kg	0.01	0.01	ICP-MS
Lithium	< LOQ	mg/kg	0.05	0.6	ICP-MS
Manganese	< LOQ	mg/kg	0.01	0.6	ICP-MS
Mercury	< LOQ	mg/kg	0.01	0.01	ICP-MS
Nickel	< LOQ	mg/kg	0.02	0.02	ICP-MS
Zinc	< LOQ	mg/kg	0.1	5	ICP-MS

Specific migration in 10% ethanol:

Name	Unit	Result	SML	LOQ	Method
Teraphthalic acid	mg/kg	<LOQ	7,5	1,5	HPLC (SAA B22)
Isophthalic acid	mg/kg	<LOQ	5	1,5	HPLC (SAA B22)
Ethylene glycol	mg/kg	SML met**	30		
Diethylen glycol	mg/kg	SML met**	30		

Migration conditions: 1.75 dm¸/ 100 ml; 10 d 60 °C
l.o.q.: limit of quantification
SML = Specific migration limit
Calc.: calculated
(T) = (SML (T) [mg/kg]): contains the total specific migration limit for the umo f substances applicable to this group.
** Due to the results of the overall migration the SML can be considered as adhered to

NIAS Screening

The migration behavior of a PET-food container should be determined by a "10 ppb" screening.

Scope: 10 ppb-Screening (GC/MS and GC/FID)
Simulant: Ethanol 95%
Duration: 10 days
Temperature: 60°C

Verbindung	Rt-MS	Probe 1 - Ergebnisse *		
	[min.]	[µg/dm²]	[µg/kg] 1)	[µg/kg] 2)
Alkanstandard (Tridecan)	11,6	9,4	56	100
Lineares PET-Oligomer	21,5	3,1	18	33
Zyklisches PET-Oligomer	27,4	3,3	20	35
Zyklisches PET-Oligomer	34,8	4,1	24	44

1) EU-convention: 6 dm˛ packaging in contact with 1 kg food.
2) The result is based on the product (400 g) with a contact area of one tray (4.28 dm˛).
* Accredited method.

Transparent articles - dual use-additives were not used.
Blue articles– dual use-additives - Phosphoric acid - E 338
Green articles– dual use-additives - Phosphoric acid - E 338
Red articles– dual use-additives - Titanium dioxide – E171
Black articles– dual use-additives - Phosphoric acid - E 338
White articles– dual use-additives - Titanium dioxide – E171, Phosphoric acid - E 338

For articles with pads, the material contains the following substances subject to restrictions:

CAS	Name	SML
	Stearic acid	5 mg/kg (as Zn)
75-21-8	Ethylene Oxide	ND
75-38-7	Vinylidene fluoride	5 mg/kg
77-99-6	1,1,1-trimethylolpropane	6 mg/kg
116-15-4	Hexafluoropropylene	ND
2082-79-3	Octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	6 mg/kg
	Aluminium	1 mg/kg
	Zinc	5 mg/kg

As indicated in art. 11 of Reg 10/2011/CE, in the material may be present substances regulated as food additives by Reg. 1333/2008/EC or as flavorings by Reg. 1334/2008/EC (these substances are also called substance "dual use").
The substances are:

CAS	Name	E number
	Carbonic acid salt	E170
13463-67-7	Titanium dioxide	E171
14807-96-6	Talc	E553b
25322-68-3	Polyethyleneglycol	E1521
	Calcium salt of fatty acids	E470a

The product meets,within the tested parameters (Report No. 1840254 Dr. Graner & Partner GmbH), the requirements of Regulation (EC) No. 1935/2004 of the European Parliament and 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 as amended on 18. 06. 2009. and fulfills the analytical requirements of Regulation (EU) No. 10/2011 of the Commission on plastic materials and articles intended to come into contact with food of 14 January 2011 (ABl. No. L 12/1), changed by Regulation(EU) No. 202/2014 of 3.3.2014 and Regulation (EU) No 2016/1416 24.08.2016 respectively by the 7th Amendment-Regulation (EU) No 2017/752 on 28.04.2017

Heavy metals according to Packaging Ordinance (DIN EN ISO 11885/SAA U46 and U22) and EC 94/62:

Heavy metals (digestion)	Content Unit	L.O.Q.	Method
Lead	< L.O.Q. mg/kg	1,0	ICP-OES
Cadmium	< L.O.Q. mg/kg	0,5	ICP-OES
Chromium	< L.O.Q. mg/kg	1,2	ICP-OES
Mercury	< L.O.Q. mg/kg	0,5	FIMS

Sum of metals : < L.O.Q. mg/kg

NIAS Screening was conducted by a 10 ppb screening (method GC/MS-GC/FID, simulant Ethanol 95%, duration 10 days at 60^{o}C temperature). Results are available at the Test report 1840254 of Dr. Graner & Partner GmbH.

The articles are in compliance to:
-EC 1895/2005 on the use and restriction of certain epoxy derivates
-REACH regulation
-EU 1169/2011 Annex ll , the absence of allergens

In our best knowledge, the articles do not contain any of the following substances:
MO(S)(A)H, Bisphenol A, Bisphenol S, Bisphenol F, primary aromatic amines (PAA)

Migration of metals - specific migration of metals (in 3% acetic acid), testing conditions:
10 days 60°C; 2,9dm²/300ml
Regarding the mentioned test conditions the specific migration limits according to Article 10 Annex II Regulation (EU) Nr. 10/2011 in the current version is not exceeded by the tested sample in the named testing agents. With regard to the analytically tested parameters, this sample meets the requirements of Regulation (EC) 1935/2004 as well as those of Regulation (EU) 10/2011. (Dr. Graner & Partner GmbH, Lochhausener Str. 205, 81249 München, Analysis report 1856821)

Specifications for use:
All food types for every storage period under cooling and deep cooling conditions, as well as a storage period of up to 30 days at a temperature of up to 40°C, 2 hours on temperature of 70°C.
Not suitable for use in traditional or microwave ovens.

Ratio of food contact surface area to volume for determining the compliance of the material is available at test report.

With regard to the specifications mentioned above, due diligence has been given to meet the legal requirements for food contact materials. The examination of the suitability of the product in terms of material-specific properties (e.g. thermal resistance of the product) is up to the user. We assume no liability for damages caused by a lack of suitability for the type of food application used. There are no objections concerning the use of this product within the context of $$ 30 and 31 Lebensmittel-, Bedarfsgegenstiinde- und Futtermittelgesetzbuch (LFGB of 3 June 2013 (BGBI. I p. 1426),changed by third Amending Regulation of 28.5.2014 (BGBI. I p. 698)).

We have implemented a traceability system as requested from Art. 17 Regulation (EC) N°1935/2004. The traceability of materials and articles is ensured at all stages in order to facilitate control and the recall of defective products.

Osijek, 18.10.2024.

Vanja Biro,
Quality control and product safety