DECLARATIONS OF COMPLIANCE – BOPET FILMS

This declaration covers the regulatory aspect of BOPET films manufactured and marketed under the brand name "PETLAR" (all variants and gauges) by SRF Ltd. India and SRF Industries (Thailand).

A. United States Food & Drug Administration (US FDA) Regulations –

(1) Compliance for Food contacts: Determination of amount of overall & net Chloroform soluble extractives –

a. US FDA - 21 CFR 177:1630 (INDIRECT FOOD ADDITIVES: POLYMERS-POLYETHYLENE PHTHALATE POLYMERS) -- The products comply with FDA regulation 21 CFR 177:1630 (a) (films made of Polyethylene Terephthalate Polymers) and specification therein (e), (f) & (g) with regard to the results for the net chloroform soluble fractions obtained from these films under the below mentioned conditions:

Solvents Used	Test Condition	Results(mg/Inch$^{2)}$	Max. Permissible Limit (mg/Inch^2)
Distilled Water	250°F for 02 hrs.	<0.2	0.5
N- Heptane	150°F for 02 hrs.	<0.2	0.5
50 % Ethanol	120°F for 24 hrs.	<0.2	0.5

b. The products are suitable for food grade applications provided they are subject to limitation found in 21 CFR 177.1630 (e) & (g) where the non-coated side to be kept in direct contact with food and the products are used in accordance with the Good Manufacturing Practice (GMP) regulations (defined in 21 CFR 174.5). Substances/Additives used either as a base sheet or as constituent of coating are as per FDA regulation 21 compliance requirements.

c. US FDA - 21 CFR 175:300: Determination of amount of extractives

Solvents Used	Test Condition	Results(mg/inch^2)	Acceptable limit (Repeated use) (mg/Inch^2)
Distilled Water	120°F for 24 hrs.	<2.0	≤18.0
8% Alcohol	120°F for 24 hrs.	<2.0	≤18.0

B. European Union Food Contact Regulations for Plastics –

(1) **EC Regulation 1935/2004 – Food Contact Materials: The Framework Regulation –**

a. The products comply with the requirements of regulation (EC) 1935/2004 as amended till Commission Regulation act 450/2009.
b. The products comply with traceability requirements set out in Article 17 (Traceability) of regulation (EC) 1935/2004.
c. The product are produced according to quality management systems, which comply with requirements of the regulation (EC) No 2023/2006 on Good Manufacturing Practice

DECLARATIONS OF COMPLIANCE – BOPET FILMS

(2) The products comply with EU 10/2011 – The Plastics Regulation (amendment 321/2011, 1282/2011, 1183/2012, 202/2014, 174/2015)
Composition of the products comply with commission regulation (EU) 10/2011 as amended under the condition that the finished article meets the following migration limits
OML 10mg/dm2 or 60mg/kg food (Article 12)
All the monomer and additives used in the composition of the above product are listed in the union list of authorised substances, See Annex I of commission regulation EU) 10/2011

Migration Limits & Testing - Plastics material are not fully inert and there are substances which can transfer or migrate from the plastic packaging into the food and vice versa. This migration of substances is regulated by Directive (EU) 10/2011 and its amendment (EU) 2015/174 of 5 February 2015 with two different migration limits: Over All Migration & Specific Migration Limit. The products comply with both the limits.

i. **Overall migration Limit:** Directive (EU) 10/2011, 2006/141/EC & 2006/125/EC limits the permissible overall migration limit i.e. the total quantity of substances released by the sample to 60mg/kg or 10 mg/dm^2 under the test conditions set out in Annex III in accordance with the rules set out in chapter 3, section 3.1 of Annex V.

SN	Test	Simulants used	Test condition	Limitations	Test Result
1	Overall Migration Test (Hydrophilic & Lipophilic Test)	Simulant-A (10 % Ethanol)	40°C for 10 Days	<10.0mg/dm^2	<2.0mg/dm^2
2		Simulant-B (3 % Acetic acid)	40°C for 10 Days	<10.0mg/dm^2	<2.0mg/dm^2
5		Simulant-D (Iso-Octane)	40°C for 10 Days	<10.0mg/dm^2	<2.0mg/dm^2

ii. **Specific Migration Limits (SML):** Directive (EU) 10/2011 amended till No 2015/174 of 5 February 2015 also stipulates specific migration limit for certain substance. The products meet the specific migration limits accordingly under the test conditions set out in Annex III in accordance with the rules set out in Chapter 2, Section 2.1 of Annex V.

PM Ref	CAS No	Substances	Limitations SML (T) Maximum	Test Condition	Tested Result
16990	000107-21-1	Ethylene Glycol	30 mg/kg	60°C for 10 Days	ND
10060	000075-07-0	Acetaldehyde	6 mg/kg	60°C for 10 Days	ND
13326	0000111-46-6	Di-ethylene Glycol	30 mg/kg	60°C for 10 Days	ND
24940	0000100-20-9	Terephthalic acid Dichloride	7.5 mg/kg	60°C for 10 Days	ND
25910	000100-21-0	Terephthalic acid	7.5 mg/kg	60°C for 10 Days	ND
35760	001309-64-4	Antimony trioxide	0.04mg/kg	60°C for 10 Days	ND

* The specific migration values given in mg/kg food are converted to mg/dm^2 film surface by multiplying with the standard conversion factor of 6, since by definition 1 kg food is enclosed by 6 dm^2 of film.

DECLARATIONS OF COMPLIANCE – BOPET FILMS

(3) Based on results obtained from specific migration test, the products do not contain Epoxy derivatives as under and comply with Directive 1895/2005/EC amended to directives 2002/16/EC followed by 2004/13/EC.

- Bisphenol A Di - Glycidyl ether ("BADGE")
- 2, 3-dihydroxypropyl ether (BADGE, H2O)
- 2, 3-dihydroxypropyl ether (BADGE.2 H2O)
- 3-chloro-2-hydroxyprpyl glycidyl (BADGE.HCL)
- (3-chloro-2-hydroxyprpyl) - 2, 3-dihydroxypropyl ether (BADGE.H2O.HCL)
- 3-chloro-2-hydroxyprpyl ether (BADGE.2HCL)
- Bis (4-hydroxyphenyl) methane ("BFDGE")
- Novolac glycidyl ethers ("NOGE")

(4) Directive 2002/61/EC amending directive 76/769/EEC relates to restrictions on the marketing and use of certain dangerous substances and preparations (Azo Colorants - which may release one or more of the Aromatic Amines). Based on results obtained from specific migration test, it is confirmed that Aromatic Amines are absent in the products.

(5) Directive 2005/84/EC amending Directive 76/769/EEC which puts regulation on the use of Phthalates as the directive states that such phthalates "shall not be used as substances or constituents of preparations, at concentrations of greater than 0.1 % by mass of the plasticized material". Based on results obtained from specific migration test, it is confirmed that Phthalates mentioned below are not added at any stage of production by us.

- Bis (2 ethylhexyl) phthalate (DEHP)
- Dibutyl phthalate (DBP) Benzyl butyl phthalate (BBP)
- Di isononyl phthalate (DINP) Di-isodecyl phthalate (DIDP)
- Di-n-octyl phthalate (DNOP)
- Di-n-hexylphthalate (DNHP)
- Di-n-ethylphthalate(DEP)
- Di-n-methoxyethyl phthalate (DMEP)
- Di-n-pentyl phthalate (DPEP)

(6) Prohibition of certain Ozone Depletion substances is defined in Directive 2000/2037/EC. The products comply with this requirement.

(7) Directive 2003/18/EC amending directive 83/477/EEC on the protection of workers from the risks related to exposure to asbestos at work. It is declared that Asbestos is not used in manufacturing and is likely to be absent.

(8) Directive 2003/118/EC amending directive 86/362/EEC, 86/363/EEC and 76/895/EEC, limits the maximum level of pesticides (Acephate, 2, 4-D and Parathion-methyl) in the material intended to come into contact with food stuff. No pesticides are present or intentionally added during any stage of production.

(9) Directive 2004/1/EC prohibits the use of azodicarbonamide as blowing agent from 2 August 2005. The products comply with this directive as azodicarbonamide is not used in the manufacturing.

(10) Council Directive 78/142/EEC along with 80/766/EEC and 81/432/EEC lays down limits for the quantity of Vinyl Chloride monomer & its derived polymer (PVC) present in the plastic materials & articles intended to come into contact with food stuffs. The products comply with this regulation as vinyl chloride monomer & its derived polymer (PVC) are not added either as main constituents or as additives during any stage of manufacturing process.

DECLARATIONS OF COMPLIANCE – BOPET FILMS

(11) Directive 90/220/EEC puts regulations over the deliberate release of genetically modified organisms into the environment. The products comply with this directive as no organism is used in the manufacturing process.

(12) During production of Films, no allergenic substances (Wheat, Crustaceans, Egg, Fish, Peanut, Soyabean, milk, Treenut, Mustard, Seasame, Lupin ,Proteins, Abietic Acid, P-Phenyldiamin, Fragrance Biocides and Plant Extracts) are used, for which a special food labelling is required by directives 2007/68/EC amending 2000/13/EC.

(13) Directive 93/10/EEC relates to the material & articles made up from regenerated cellulose film intended to come into contact with the foodstuffs. As per annexure-I of this directive, the regenerated cellulose film obtained from refined cellulose derived from non-recycled wood or cotton is not classified as plastic. Such refined cellulose derivatives are not used in manufacturing process.

(14) The products do not contain any substances falling under the list of lipophilic substance as given in 10/2011/EC.

(15) It is confirmed that the products are manufactured from Polyethylene Terephthalate (PET) polymers as identified with Code **"1"** in the list of Annexure of Directive 97/129/EC (Establishing the identification system for packaging materials pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste) in accordance with the procedure laid down in Article 1 of EC Directive 94/62EC.

(16) Nanomaterials (insoluble or bio-persistent and intentionally manufactured materials with one or more external dimensions, or an internal structure, on the scale from 1 to 100 nm) are not used in the manufacture of or the formulation of the products.

C. REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals)

Regulation (EC) 1907/2006 of 18 December 2006 concerns the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). The SRF PETLAR products comply with all substance as listed in the REACH candidate list of 163 as amendment till 15 June 2015 with 2 new Substances of Very High Concern (SVHC).

D. ROHS (Restriction of Hazardous Substances) & CONEG

The products comply with Article 11 of EU Directive 94/64/EC (Article 11), ELV Directive 2000/53/EC, and RoHS Directive 2002/95/EC (as amended by 2005/618/EC) & 2003/11/, EC directive EU 2015/863.

CONEG (Coalition of Northern Eastern Governors) Model Toxics in Packaging Legislation, 1989 - and European Directive 94/62/EC, incl. European Directive 2004/12/EC, (Packaging Waste Directive) legislation suggests that, the total content of lead, mercury, cadmium and chromium (VI) in packaging and packaging components must not exceed 100 ppm by weight. The products comply with the requirements of the toxics in packaging law(s) and the regulated metals – lead, mercury, cadmium, and hexavalent chromium -- were not intentionally added to any package or packaging component during the manufacturing process and the test results indicate the absence of these substances.

DECLARATIONS OF COMPLIANCE – BOPET FILMS

E. ISO Certifications

The products are being produced under the ISO 22000:2005 – Food safety management system covering the HACCP (Hazard and Critical Control points) and Good Manufacturing Practice (GMP) regulations (under the provision of LFGB 30 & 31, EC regulation 2023/2006/EC as well as USFDA 21 CFR: 174.5) within a quality management system, certified as per ISO 9001: 2008. The manufacturing processes also comply with the requirements of ISO 14001:2004- Environment Management Systems.

F. OTHERS

(1) The products comply with German "Lebensmittel-Bedarfsgegenstande-und futtermitte, gesetzbuch, LFGB 30 and 31, " book of legislation for food stuffs, daily needs and animal feed in the edition as of 01.09.2005" and "Bedarfsgegenstandeverrordnung" regulation for the use of daily needs from 10.04.1992, modified on 21.12.2000 (Implementation of supplementary directive 99/9/1/EC).

(2) It is declared that the products do not contain any source of tin {Dibutyltin (DBT), Tributyltin (TBT), Monobutyltin (MBT), Alkyltin or other organotin compounds} and not intentionally added during any stage of production.

(3) Halogens, Fluorinated substances (PFOS, PFOA), Chlorinated substances (hydocarbons, parafins, PVC, Vinylchloride), Brominated substances, iodinated & Astatinated substances are not used in raw material or any stage of manufacturing process.

(4) The products are free from Latex content as it is not used during any stage of manufacturing.

(5) Section 1502 of the Dodd –Frank-Act amends Section 13 of the securities Exchange Act 1934 and requires the Securities Exchange Commission (SEC) to enact rules and regulations that impose disclosers and in some instances, auditing requirements on publicly traded companies who use " conflict materials: { defined as (a) gold, wolframire, columbite-tantalite (cotton) or their derivatives; or (b) " any other material or its derivatives determined by Secretary of State to be financing conflict in the DRC (Democratic Republic of the Congo) or an adjoining country "} in manufacturing their products. It is declared that none of conflict minerals is used in any stage of manufacturing.

(6) Some polymer production aids, aids to polymerisation, non-intentionally added substances, are governed by national legislations having positive lists and /or assessed in accordance with internationally recognized scientific principles on risk assessment.

(7) The products are free from dual use additives listed in the European legislation on additives or flavourings [Regulation (EC) No 1333/2008 on food additives, or Regulation (EC) No 1334/2008 on flavourings] and not used in any stage of manufacturing.

(8) Products are composed of PET resin (Polyethylene terephthalate resin, 25038-59) which is manufactured by using Terephthalic Acid (TA, 100-21-0) and Ethylene Glycol (000107-21-1) as raw materials.

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Specification on use:

a) Types of food intended to come into contact with the products: fruits, vegetables, dry food, fatty foods, alcoholic food with < 50 % conc., acidic food < 4.5 pH and food having hydrophilic character.
b) Types of food not intended to come into contact with the material: Alcoholic food> 50 % conc.
c) Duration and temperature of treatment and storage while in contact with food: 10 days at 40^0C tested.
d) Ratio of area of food contact material to the volume used to determine the compliance: (1.0 ml/cm2).

By complying with the above mentioned regulations, SRF has fulfilled its responsibility for supplying the products in conformance to the legislations governing food contact applications.

Issue Date: 04, Nov 2015

Disclaimer:
This declaration is given in good faith and to the best of our knowledge. It covers the composition of SRF PETLAR Films and does not imply technical suitability of the product in its intended use. This declaration replaces all previous declarations and remains valid until a change in the legislation or new scientific information change the legal status. In case of any change, SRF will inform customers accordingly.

It remains the user's responsibility to assess the suitability and completeness of this information for particular use and that the finished articles are in actual compliance with the specific and overall migration limits. It is responsibility of users to abide by any clause of this, or other regulation, that may apply to the specific use that is made of PETLAR products. Our test on PETLAR Film cannot replace migration test on the finished articles, especially if the film is combined with other materials. However user is entitled to make this information available to its customer and institutes to the extent as is needed for assessing compliances or measuring migration. In such situation, the institute concerned and user's customer should be instructed that passing on this information to others, in particular to our competitors, is not permitted The food packer is responsible for ensuring that the finished food package complies with applicable restrictions in the food itself under actual conditions of use. Possible interactions of the film and its components with the foodstuff (i.e. modification of odour, taste, consistency, migration, etc.) are to be checked prior to use and in function of the end-uses.

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