

DECLARATION OF COMPLIANCE

version 01, 07.09.2026

1. Name and address of operator of the market who issues declaration of compliance:

Guillin Polska Sp. z o.o.
56-400 Oleśnica
ul. Przemysłowa 3

2. Name and address of operator of the market who produces or imports materials or plastic products; products coming from intermediate processes of production; substances used to production of those materials and products:

Guillin Polska Sp. z o.o.
56-400 Oleśnica
ul. Przemysłowa 3

3. Reference of materials, products coming from intermediate processes of production or substances used to production of those materials and products

Packaging manufactured from polyethylene terephthalate (PET) film and intended for direct contact with food, including packaging made from virgin PET and packaging containing recycled PET (rPET). This Declaration covers transparent and coloured versions of the products.

4. Confirmation of compliance with legal requirements

We hereby confirm that the product complies with the requirements of the following regulations and standards:

- Regulation (EC) 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.
- Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, together with all subsequent amendments, including in particular:

Commission Regulation (EU) 2024/3190 of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213

and,

Commission Regulation (EU) 2025/351 of 21 February 2025 amending Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, amending Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with food and

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Sąd Rejonowy dla Wrocławia-Fabrycznej we Wrocławiu, IX Wydział Gospodarczy Krajowego Rejestru Sądowego

KRS nr 0000202333 - NIP PL 9111852886 - Kapitał zakładowy 21 048 500 PLN

Konto bankowe nr PL 92 1600 1156 0004 0601 4391 1001 (PLN) - nr PL 58 1600 1156 0004 0601 4391 1031 (EUR)



repealing Regulation (EC) No 282/2008, and further amending Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food, with regard to recycled plastics and other matters related to quality control and the manufacture of plastic materials and articles intended to come into contact with food.

- Commission Regulation (EC) No 2023/2006 of 22 December 2006 concerning good manufacturing practice for materials and articles intended to come into contact with food.
- Commission Regulation (EU) 2022/1616 of 15 September 2022 on recycled plastic materials and articles intended to come into contact with foods and repealing Regulation (EC) No 282/2008
- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, (amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC) to the extent applicable.

5. Recycled plastic materials – information in accordance with Regulation (EU) 2022/1616

For product references containing recycled PET, this Declaration shall be read together with the Converter's Declaration of Compliance issued in accordance with Regulation (EU) 2022/1616, Annex III, Part B.

6. Verification of overall migration and compliance with SML and NIAS

6.1. The products covered by this Declaration comply with the overall migration limits (OML) in accordance with Regulation (EU) No 10/2011 under the following test conditions:

Food simulant	Contact conditions	Unit	Criteria	Statement of compliance
10% ethanol	10 days in 40°C	mg/dm ²	≤ 10	Pass
3% acetic acid	10 days in 40°C	mg/dm ²	≤ 10	Pass
olive oil	10 days in 40°C	mg/kg	≤ 60	Pass

6.2. Based on the declarations provided by the raw material manufacturers, we hereby confirm that the substances used in production are subject to specific migration limits (SML) in accordance with Annexes I and II of Regulation (EU) No 10/2011.

Test substance	Food simulant	Contact conditions	Unit	Criteria	Statement of compliance
Acetaldehyde (CAS: 75-07-0; Ref: 10060)	3% acetic acid	10 days at 60°C	mg/kg	≤ 6 (1)	Pass
Ethylene glycol (CAS: 107-21-1; Ref: 16990, 53650)	95% ethanol	10 days at 20°C	mg/kg	≤ 30 (2)	Pass
Diethylene glycol (CAS: 111-46-6; Ref: 13326, 15760, 47680)	95% ethanol	10 days at 20°C	mg/kg	≤ 30 (2)	Pass

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Terephthalic acid [CAS: 100-21-0; Ref.: 24910]	95% ethanol	10 days at 20°C	mg/kg	≤ 7.5 (28)	Pass
Isophthalic acid [CAS: 121-91-5; Ref.: 19150]	95% ethanol	10 days at 20°C	mg/kg	≤ 5 (27)	Pass
Ammonium ion	Water	10 days at 60°C	mg/kg	≤ 60	Pass
Siloxanes and silicones, dimethyl-, 3-hydroxypropyl-methyl, polyethylene glycol monomethyl ether (CAS: 68938-54-5)	95% ethanol	10 days at 20°C	mg/kg	-	not detected

6.3. Testing of non-intentionally added substances (NIAS) migration

Type of test	Food simulant	Contact conditions	Unit	Criteria	Statement of compliance
*Screening of non-intentionally added substances (NIAS), migration into food simulants [GC-MS/FID]	95% ethanol	10 d/20°C	mg/kg	–	Pass (Below quantification limit)
Screening of non-intentionally added substances (NIAS), migration into food simulants [LC-QTOF MS]					
C16 H35 N O [Mass = 279.0; RT: 21.998, 20.5 min; $\Delta m/z$ = 0.02, 0.34 ppm; Score = 99.24, 99.53 %]	95% ethanol	10 d/20°C	mg/kg	–	–
Sum of substances recognized as a mixture of methyl-branched and linear C14–C18 alkanamides, derived from fatty acids	95% ethanol	10 d/20°C	mg/kg	≤ 5	Pass
C16 H31 N O [RT: 21.713 min; Mass = 253.24056; $\Delta m/z$ = -0.02 ppm; Score = 99.6 %]	95% ethanol	10 d/20°C	mg/kg	–	–
Abietic acid [CAS: 514-10-3; RT: 20.502 min; $\Delta m/z$ = 0.24 ppm; Score = 99.79 %]	95% ethanol	10 d/20°C	mg/kg	≤ 60	Pass
Eicosenamide [CAS: 10436-08-5; RT: 23.146 min; $\Delta m/z$ = 0.13 ppm; Score = 99.54 %]	95% ethanol	10 d/20°C	mg/kg	≤ 60	Pass
9-Octadecenamide (Oleamide) [CAS: 301-02-0; RT: 22.114 min; $\Delta m/z$ = 0.3 ppm; Score = 90.46 %]	95% ethanol	10 d/20°C	mg/kg	≤ 60	Pass

6.4. Compliance assessment regarding bisphenols

Bisphenols or bisphenol derivatives intentionally used in the manufacture of the products: None.

The specific migration of bisphenol A, bisphenol S, bisphenol F, bisphenol AF and bisphenol B was determined to be below 0.001 mg/kg of food simulant (95% ethanol, 10 days at 20°C), confirming that no detectable migration of the tested bisphenols occurred.

7. Relevant information on substances subject to restrictions in food

No substances classified as dual use additives have been used in the manufacture of the products covered by this Declaration.

The total concentration of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr VI) does not exceed 100 mg/kg.

No primary aromatic amines listed in Annex II of Regulation (EU) No 10/2011 are present.

Aromatic amines	Food simulant	Test conditions	Unit	Criteria	Statement of compliance
Sum of primary aromatic amines	3% acetic acid	10 days at 60°C	µg/kg	≤10	Pass

8. Requirements concerning substances present in packaging

PFAS compliance assessment in accordance with Regulation (EU) 2025/40

Test method	Unit	Criteria	Statement of compliance
Total fluorine (TF)	mg/kg	≤ 50	Pass

Based on the total fluorine assessment and the stepwise approach recommended in the European Commission Guidance on Regulation (EU) 2025/40, the products covered by this Declaration are considered compliant with the following PFAS concentration limits:

- < 25 µg/kg (ppb) for any individual non-polymeric PFAS;
- < 250 µg/kg (ppb) for the sum of non-polymeric PFAS;
- < 50 mg/kg (ppm) for total fluorine (TF).

9. Requirements to use of material or product

(i) Products made of PET foil are intended to come into contact with any type of food,

(ii) The technical temperature range of the PET material is from -40°C to +60°C.

Intended food-contact conditions: any long-term storage at room temperature or below, including heating to 50°C for no longer than 2 hours.

(iii) The contact surface / volume simulant 6 dm²: 1 kg of food

(iv) Recommended storage temperature -10°C to +50°C

(v) The storage period is not specified – recommended: 24 months

10. If a multi-layer material or article functional barrier is used - confirmation that the material or article complies with the requirements of Art. 13 paragraph. 2, 3 and 4 or art. 14 paragraph. 2 and 3 of this Regulation:

No functional barrier present.

This Declaration has been issued on the basis of test results and declarations provided by the manufacturers and suppliers of raw materials and other materials used in the manufacture of the products.

According to Article 15(3) of Commission Regulation (EU) No 10/2011: "The written declaration shall permit an easy identification of the materials, articles or products from intermediate stages of manufacture or substances for which it is issued. It shall be renewed when substantial changes in the composition or production occur that bring about changes in the migration from the materials or articles or when new scientific data becomes available."

Guillin Polska Sp. z o.o., as the business operator manufacturing food-contact products and issuing this Declaration, will renew the Declaration if any of the circumstances referred to above arise.

Name	Position	Date	Signature
Bożena Kroczeł	Quality Manager	07.09.2026	

CONVERTERS DECLARATION OF COMPLIANCE with REGULATION (EU) 2022/1616

I, the undersigned, declare in name of Guillin Polska Sp. z o.o. as identified in Section 1.1, that the recycled plastic material identified in Section 1.2 was produced in accordance with Regulation (EU) 2022/1616. The recycled material to which this declaration applies is suitable for use in contact with food, provided it is used in accordance with the restrictions set out Section 3 of this declaration, and with the instructions in this declaration and with the labelling on the product. Hereby I declare that the contents of this declaration is correct to the best of my knowledge and in compliance with Regulation (EU) 2022/1616.

Section 1. Identification

1.1. Converter	1.2. Product with recycled plastic	1.3. Competent authority
1.1.1. Name: Guillin Polska Sp. z o.o.	1.2.1. Tradename/designation: Food-contact packaging made from polyethylene terephthalate (PET) containing recycled PET (rPET), transparent or coloured	1.3.1. Name: State District Sanitary Inspector in Oleśnica
1.1.2. Address: ul. Przemysłowa 3 56-400 Oleśnica	1.2.2. Batch N°: Batch number: as indicated on the box label	1.3.2. Address: ul. 3 Maja 20 56-400 Oleśnica
1.1.3. Country: Poland	1.2.4. Other info: RFN: PL5-8Z6-0FJ RON: PL5-8Z6-00H	1.3.3. Country/region: Polska/dolnośląskie
		1.3.4. Reg. number: 2043/015/25

Section 2. Compliance

2.1.		
2.1.1	Origin of recycled plastic; RIN numbers	Recycled material: Internal installation: DeCON20_1_ Guillin Polska RIN: PL5-6NL-0IQ Supplier: RIN: PL2-FMS-1IL
2.1.2	Batch numbers recycled plastic from decontamination installation	rPET decontamination batch No(s) linked to the finished-product batch shown on the box label and recorded in the traceability system.
2.1.3	Maximum recycled content indicated by recycler (Part A, 3.1.1)	80%

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2.1.4	Actual recycled content of this product		Min. 30%	
2.1.5	Restrictions provided in the Declaration of compliance received from the recycler are met		☒	
2.1.6	Addition of additives or starting substances	☒ Added additives or starting substances comply with Regulation (EU) No 10/2011	☐ No additions	
Section 3. Instructions and information to users of the product				
3.2 Instructions to users further down the supply chain, including end users				
3.2.1	The product identified in Section 1.2 is a: (tick as applicable; both may apply)	A) a recycled plastic for further conversion stages	☐	
		B) a final plastic material or article suitable for contact with food without further processing.	☒	
3.2.2	Type or types of food with which it is intended to be put in contact	All type of food		
3.2.3	Time and temperature of treatment and storage in contact with the food	The products are intended for long-term storage at room temperature or below, including heating to 50°C for no longer than 2 hours.		
3.2.4	The highest food contact surface area to volume ratio for which compliance has been verified	6dm²/kg		
3.2.5	List of added substances with migration limits; add rows as required. (note: FCM Number and specific migration limit ('SML') may not exist for certain substances)	FCM No	Other designation (CAS No, chemical name)	SML* (mg/kg food)
		785	100-21-0, Terephthalic acid	< 7.5 (28)
		128	75-07-0, Acetaldehyde	< 6 (1)
		227	107-21-1, Ethylene glycol	< 30 (2)
		263	111-46-6, Diethylene glycol	< 30 (2)
		291	121-91-5, Isophthalic acid	< 5 (27)
3.2.6	Other relevant information and instructions, including in accordance with points 7 and 9 of Annex IV to Commission Regulation (EU) No 10/2011(1)			See above declaration according to Regulation 10/2011

3.2.7	The recycled plastic to which this declaration applies is contained in a layer in a multi-layer material or article subject respectively to Articles 13 or 14 of Regulation (EU) No 10/2011 that contains plastic manufactured in accordance with that Regulation in another layer or layers. A separate declaration of compliance in accordance with Article 15 of that Regulation regarding that layer or those layers is available and must be taken into account.	☐
Section 4. Signature		
4.1 Signature and company stamp	 	
4.2 Name of person signing	Bożena Kroczen	
4.3 Role/position of person signing	Quality Manager	
4.4 Date and place	Oleśnica, 07.09.2026	