



DECLARATION OF COMPLIANCE FOR FOOD CONTACT MATERIALS

1. Producer and signatory identity

M. Michelangelo Anderlini

Role : Technical Director

Producer : BIOPAP Srl Società Benefit, Via Edison 237 – 20019 Settimo Milanese (MI) Italy

2. Material identification

Description Compostable BIO Film

Reference: BIO Film PBBIO

Material Structure:

BIO Film is composed of a base sheet of regenerated cellulose film and two surface coating layers. The films are within the scope of Article 2(c) of Directive 2007/42/EC.

The base sheet of regenerated cellulose film is regulated exclusively by the rules laid down in Directive 2007/42/EC.

The surface coating layers fall within the scope of Regulation (EU) No 10/2011 (Article 2(1)(e)).

Declaration Date : 04/02/2026

3. Material Conformity

The Above film is suitable for direct food contact with dry, watery, acid, low alcoholic, dairy and fatty food according to:

*Italian DM 21-03-1973 and subsequent updates

*Reg. CE 1935/2004

*Reg. UE 10/2011, 1416/2016 and Reg. UE 2018/831, 37/2019 and 1338/2019

* Italian DPR 777/82 and subsequent updates

*Directive CE 2023/2006 (GMP) and following the guidelines of the BRC IOP (packaging) and USA GMP requirement (21 CFR 110)

*FDA Regulations, 21 CFR Regulations part 175-186, 1st April 2016 suitable for food contact with Dry foods, Aqueous and fatty food grades I, II, III IV-A, IV-B, V VII-A, VIIB, VIII, IX as described in table 1 of 21 CFR 176-170(c) under "conditions of use" E, F, G, H as defined in table 2 of 21 CFR 176-170(c)

This declaration of conformity has been established based on the following elements:

Raw materials suppliers' declaration

Global Migration Analysis : limits <10mg/dm²

Simulant	Time	Temperature
A (Etanolo al 10%)	10 gg	40°C
B (Acido Acetico 3%)	10 gg	40°C

C (Etanolo 20%)	10 gg	40°C
D1 (Etanolo al 50%)	10 gg	40°C
D2 (olio di oliva rettificato)	10 gg	40°C
E (MPPO)	10 gg	40°C

4. Information on Substances subject to specific restrictions

- Specific Migrations :

The conformity has been assessed assuming that 100% of the substances included in the material would migrate independently from contact time and temperature.

Substance	Identification FCM	Limit mg/kg	Results mg/kg
Vinyl chloride	127	0,01	<0.01
Vinylidene chloride	130	0,01	<0.01
Acrylonitrile	225	0,01	<0.01
2,4,6-triamino-1,3,5triazine	239	2,5	<2.5
Tetrahydrofuran	246	0,6	<0.6
Methacrylonitrile	312	0,01	<0.01

- Dual Use Substances

According to the information received from our raw material suppliers, a substance authorized as a food additive according to Reg. (EC) 1333/2008 and subject to restriction may be present in the composition.

Substance	Identification: n° E
Butylated hydroxytoluene	E321
Carnauba wax	E903

5. Information relevant for the final use of the material

BIO film is suitable for direct food contact with dry, watery, acid, low alcoholic, dairy and fatty food

Standard food contact conditions:

- Suitable for refrigerated or room temperature storage
- Suitable for hot filling up to 70°C up to 120 minutes
- Suitable for Re-heating up to 100°C up to 15 minutes
- Suitable for Re-heating in Micro-wave oven up to 5 minutes at 800W

NOTICE: Avoid proximity and contact with flames, hot surfaces and heating resistances. Do not freeze below -30°C.

Maximum contact surface ratio to establish the compliance for this declaration: **1kg of food per 6 dm²**



6. Percentage of renewable components

Percentage of bio-based in BIO Film > 90%

7. Other Information

- Allergens

Allergenic substances listed in Annex II of Reg. No. 1169/2011, are intentionally not added in the manufacture of the subject film.

- Nano components

Based on the current information received from our suppliers, no substances in nanoscale form are used as a component or intentionally added to production recipes.

- REACH

According to current information received from our suppliers, only chemical components compliant with REACH regulation (EC) No. 1907/2006 are used in the production recipes. In particular, the substances of Annex XIV and Annex XVII of this Regulation are not present in the manufacturing recipes.

This declaration is valid only for the material or object as delivered (Film) and as long as there is no regulatory modification or change likely to result in a modification of the inertia of the material or of the item.

In any case, compliance is undertaken only with proper conditions of storage, handling and use, taking into account the particular characteristics of the material or object and as set for by usage or professional codes.

In the event of a change in the characteristics of the packed product, its composition or its destination, as well as in the event of a change in the conditions of use of the material or article, the person to whom this declaration is made must ensure the compatibility Food/Packaging for which he assumes the sole responsibility



Dr. Eng. Michelangelo Anderlini
(Technical Director)



BIOPAP S.R.L. SOCIETÀ BENEFIT
VIA EDISON, 237
20019 SETTIMO MILANESE (MI) - ITALY

TEL/PH + 39 02 48926406
FAX +39 02 48929991
E-MAIL INFO@BIOPAP.COM
WWW.BIOPAP.COM

DATI LEGALI:
P.IVA N. 13365280158
C. F. N. 13365280158
R.E.A. CCIAA MILANO N.1642715
CAPITALE SOCIALE 196.690,00 EURO I.V.