Declaration of Conformity for
DMD Acetates for Food Packaging

All products manufactured by DMD are produced in materials which conform to the following European food legislation regulations.

Regulation EU 10/2011 - Plastic materials and articles intended to come into contact with food including all amendments; including EU Exit & Wales 2012.

Other General Legislation;

- Framework Regulation on materials and articles intended to come into contact with food Regulation EC 1935/2004
- EC 2023/2006: Good Manufacturing Practice for materials and articles intended to come in contact with food
- EC 2022/1616: Recycled plastic materials and articles intended to come into contact with food
- Directive 94/62/EC: Packaging and Packaging Waste, as amended by Directive 2004/12/EC
- Directive 1895/2005/EC: Restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food.
- Directive EC 450/2009: Active and intelligent materials and articles intended to come into contact with food.
- Directive EC 1169/2011: Allergens listed in provision of food information to consumers regulations.

DMD declares that products marketed comply with UK and EU legislation and are suitable for contact with food intended for human consumption in accordance with Regulation 10/2011 of the European Community.

Suitability for use

With regards to BRC Global Standards for Food Safety requiring verification that packaging is suitable for purpose for the product being put in it, packaging manufactured by DMD is deemed suitable and fit for purpose for use as bakery product packaging which by nature may be high in fat and sugar content. Our products are produced in materials designed for product transport and protection, they are suitable for freezing down to -40degC however they are not suitable for re-heating or for hot fill applications.

Due to the nature of plastics used, the products when stored in dry and ambient conditions have a shelf / usable life of 20+ years.

Material Recycled Content Composition

All trays manufactured by DMD are produced from Polyethylene Terephthalate sheet (PET - resin code 1), with typically around 70-80%* recycled content sandwiched between layers of virgin material. The recycled plastic content follows a process validated by EFSA. Information on the characteristics and tolerances is available on request. PET, is currently considered widely recyclable in the UK.

See below table material composition regarding UK Plastic Packaging Tax eligibility and recyclability. A minimum of 30% post-consumer recycled material is present in all lines to satisfy current legislation.

Colour / Additives	Virgin Material	UK PPT Qualifying Recycled Content[1]	Other Recycled Content[2]	Overall Recycled Content	Compostable	Recyclability
Clear	30%	53%	17%	70%	No	Widely recycled
Clear + Cold Impact	40%	40%	20%	60%	No	Widely recycled
High Clarity	70%	30%	0%	30%	No	Widely recycled
High Clarity + Cold Impact	70%	30%	0%	30%	No	Widely recycled
EcoPET	20%	63%	17%	80%	No	Widely recycled
EcoPET + Cold Impact	20%	63%	17%	80%	No	Widely recycled
Non-IR Black	20%	55%	25%	80%	No	Not recycled
IR-Detectable Black	20%	55%	25%	80%	No	Check Local

* Figures are approximate based on suppliers most recent data and can fluctuate due to processing methods and material availability
1) material generated by households or commercial, industrial or institutional facilities in their role as end users of the product; this includes DMD as an industrial end user where our waste is not recycled into in-house extrusion of new sheet material.
2) material generated by our suppliers manufacturing process.

Testing of raw material for compliance

Verification is done by collecting analytical data from third party laboratories reports supplied to us from material suppliers. DMD also undertakes independent testing when suppliers latest testing exceeds 3 years. Tests are conducted on generic samples by an approved laboratory; this includes migration testing and heavy metal testing.

Overall Migration Testing

The material was tested in accordance with the requirements of the Plastic Materials and Articles in Contact with Food Commission Directive 2002/72/EC following Methods BSEN 1186:2002.

The Regulations require that no plastic material shall be capable of transferring its constituents to food with which it may come into contact in quantities exceeding the appropriate limit.

For the material the appropriate limit is 10 mg/dm².

The migration from the material was less than the maximum permitted by the Regulations.

Only those monomers listed in the Union List Regulation are used to manufacture DMD acetates. The substances that have Specific Migration Limits (SML's) or restrictions are listed below:

Substance	Regulation Reference	Limit
Terephthalic Acid	PM/Ref 24910	SML 7.5 mg/kg
Isophthalic Acid	PM/Ref 19150	SML 5 mg/kg
Ethylene Glycol **Diethylene Glycol**	PM/Ref 16990 PM/Ref 15760	SML 30 mg/kg (total)
Antimony based catalyst	PM/Ref 35760	SML 0.04 mg/kg
Titanium Nitride	PM/Ref 93485	Addition Rate <20ppm

Test Materials have been tested in accordance with EU Directives for food contact with all aqueous and fatty foods. The results demonstrate that the polymer meets the migration limits as above when tested for 10 days at 40°C in simulants specified by the Regulation EU 10/2011 using test methods EN1186 1, 2 and 3. Testing has also demonstrated that the material complies with the specific migration levels when using 50% alcoholic simulants.

Total Heavy Metal Determination

The material was tested in accordance with the requirements of the Directive 94/62/EC: Packaging and Packaging Waste Total Heavy Metal Determination in accordance with EU 10/2011. Analysis of samples for total elements was carried out using Inductively Coupled Argon Plasma Spectrometry.

The Regulations require that the cumulative total for the four heavy metals must not exceed 100mg/kg for any material tested.

The submitted samples complied with the total heavy metal requirements of Directive 94/62/EC.

Non-Intentionally Added Substances (NIAS)

DMD confirms that there is no intentional addition or generation of the following during the manufacture of DMD acetates:

- Allergens listed in Regulation (EU) No 1169/2011 as part of their formulation
- BHA / BHT nor are they used or generated during the manufacture of APET / RPET raw materials.
- Animal derivatives
- Plasticisers
- Epoxy derivatives (1895/2005/EC)
- PVC
- Polycyclic Aromatic Hydrocarbons
- Any substance on the candidate list for SVHC
- Cadmium, Mercury, Lead or Chromium or their compounds
- GM Materials
- Halogens
- Latex
- Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)
- Brominated flame retardants - a group of chemicals which are used as flame retardants in fabrics and plastics. Most textiles with flame proofing currently use brominated flame retardants.
- Bisphenol A and Bisphenol S (EU 2024/3190) - used in the manufacture for food cans and lids and is the main ingredient in polycarbonate plastics and the oil industry. Phthalates (specifically DEHP, DBP, BBP, DINP, DMEP, DPP, DiPP, BBP and DiBP) - a group of chemicals used as plasticisers in many PVC products, glues and inks and as solvents in cosmetics.
- Alkyltin - compounds used as preservatives, antibacterial agents and catalysts in the production of some plastics. Also called organotin compounds.
- Alkylphenols and their derivatives
- Artificial musks such as nitro musks and polycyclic musks
- Triclosan - a chlorinated organic anti-bacterial chemical with close structural similarities to dioxins and furans.
- Any fluorides or compounds containing fluorides.
- PFC's, PFAS's, HFC's, CFC's including those listed below:
    - Perfluoro Octane Sulfonate (PFOS), Perfluoro Octanoic acid (PFOA) Perfluoro Nonanoic acid (PFNA), Perfluoro Decanoic acid (PFDA) Hydrofluorocarbons (HFC's), Regular Chlorofluorocarbons (CFC's)

Other Compliance and Additives

DMD acetates comply with the requirements of FDA regulation for material in contact with food 21 CFR 177.1630 – Polyethylene Phthalate Polymers.

DMD acetates do not contain substances listed in point 1 of Annex II of the Plastics Regulation or release Primary Aromatic Amines.

DMD declares that a Phosphorous based food additive E338 is used in the manufacture of Virgin PET pellet and is regarded as a dual use additive that complies with purity limits 2008/84/EC. Food Additive E338 is also listed in Regulation 10/2011 and can be used without restriction.

As defined in the Reach Regulations as material is a polymer there is no requirement to register. DMD can confirm that raw materials suppliers have declared that their substances used by DMD are REACH registered where required.

The Plastic Regulation EU 10/2011 specifies certain responsibilities across the entire supply chain for food contact materials and articles. Therefore, to comply with EU 10/2011, it is the responsibility of the downstream user to conduct appropriate risk assessment which may include migration analysis to assess the effect of this downstream processing on the final food contact article.

With regards to EC 282/2008 DMD has well equipped quality control to ensure conformance of incoming raw materials with specification stipulated in our Quality Assurance System. DMD also monitors processing conditions during each stage of the production process and has a strict control of non-conforming products through an organised Quality Assurance System.

General

De-nest additives used are either/both internal anti block (for heat seal application) or food grade silicone. On silicone coated materials the dosage is 1:20 and there is no duel use.

- DMD acetates comply and meets the minimum legal requirements that are set within the UK & EU.
- DMD Ltd is certificated to the BRCGS for Packaging & Packaging Materials.
- All certificates/documentation are either available off the DMD website or on request.
- DMD carefully observe new publications of the relevant laws and will inform the customer about changes in laws which are of importance with the use of this product.
- This document is valid for a maximum of 3 years from the date of issue as noted in the footer.