



DECLARATION OF COMPLIANCE

1 Issued by

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Cukrovar 1705
665 01 Rosice
Czech Republic

2 Resin manufactured by

rPET InWaste, s.r.o.
Cukrovar 1705
665 01 Rosice
Czech Republic

3 Date of issue

1.9.2022

3.1 Last revision

31.1.2025 (version 2.03)

4 Products

Specification:

Recycled Post Consumer polyethylene terephthalate (rPET) regranulate

Product name:

PET Regranulate clear L (PRCL)

5 Identification data of the process

RIN: CZ0-581-011, RFN: CZ0-60B-0FU, RON: CZ0-60B-0OS
EFSA Question number: EFSA-Q-2020-00526
EU register number: RECYC231
FDA NOL: 244
RecyClass: RC246-FOH-05-25-SRC-PB-E01



6 Compliance with the relevant legislation

We confirm that our product listed above is in compliance with the following regulations and requirements, as amended up to the date of issuance of this Declaration of Compliance (DoC):

Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, amended (EU) 2020/1245, (EU) 2023/1442 and (EU) 2023/1627.

Decree of Ministry of Health of the Czech Republic No 38/2001 Coll., on hygienic requirements for products intended to come into contact with foodstuff and meals, as amended, in compliance with **Act of Czech Republic No. 258/2000 Coll.**, on public health protection, article 25.

Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food .

- The product is compliant with the safety requirement set out in Article 3.1(a) of this Regulation.
- Given that resin is subject to further processing (i.e. injecting into preforms and blowing of the preforms into bottles), it is for the final food contact article manufacturer to ensure that the final article is still in compliance with Article 3.1(a).
- It is also the responsibility of the final article manufacturer to ensure that it does not alter the composition of the packaged foods (Article 3.1.b) and/or downstream users putting the final article in contact with foods, (e.g., the filler – if he is not the manufacturer of the finished bottle), to ensure that the organoleptic characteristics of the packaged food are not altered (Article 3.1 (c)).

Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food and its amended **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** on materials and products of plastics coming from recycling destined to contact with food.

- The manufacturing of the product is carried out according to the „Good Manufacturing Practice“ (GMP) for materials and goods destined to come to into contact with food. The manufacturing of the product mentioned above is carried out according to ISO 9001 certified quality system which ensures that the requirements of good manufacturing practice are met.
- The recycling process used to manufacture the recycled plastics has been favourably evaluated by the European Food Safety Authority, Panel on Food Contact Materials, Enzymes and Processing Aids (EFSA CEP).



Safety assessment of the process was published 10.5.2022 on EFSA journal.

- Requestor: Czech Competent Authority (National Institute of Public Health)
- Question number: EFSA-Q-2020-00526
- DOI: <https://doi.org/10.2903/j.efsa.2022.7273>
- EU register number: RECYC231

- We declare that inputs in the form of plastic flakes, the recycling process and recycled plastics meet the specifications for which the EFSA approval was granted.
- RIN: CZ0-581-0I1, RFN: CZ0-60B-0FU, RON: CZ0-60B-0OS

Directive 94/62/EC on packaging and packaging waste, amended **Directive (EU) 2018/852**.

We declare that our products are manufactured in accordance with **EN 15343:2008** Plastics - Recycled Plastics - Plastics recycling traceability and assessment of conformity and recycled content.

We declare that our products are that our products are evaluated in accordance with **EN 15348:2015** Plastics - Recycled plastics - Characterization of poly(ethylene terephthalate) (PET) recyclates.

7 Certificates and approval

- rPET InWaste s.r.o. resins are approved by **Czech National institute of public health** - The compliance of the recycling process of PET material from the so-called post-consumer used PET packaging, NGR technology (No. 21 0054).
- rPET InWaste s.r.o. resins are approved by **EFSA** - Safety assessment of the process rPET InWaste, based on the NGR technology, used to recycle post-consumer PET into food contact materials (No. EFSA-Q-2020-00526).
- rPET InWaste s.r.o. resins are manufactured within U.S: Food and Drug Administration (**FDA**) approved LSP P:REACT system. NOL 244. PNC 002584.
- rPET InWaste s.r.o. resins are manufactured within the **ISO 9001** international standard for quality management systems.
- rPET InWaste s.r.o. resins are manufactured within the **ISO 14001** internationally recognized standard for environmental management system.
- rPET InWaste s.r.o. has been assessed by **RecyClass** in accordance with the Audit Scheme Version 2.2 in line with EN 15343:2007 and has the required procedures in place in order to ensure the traceability of recycled. Audit Report and Certificate Code: RC246-FOH-05-25-SRC-PB-E01. Certification module: General (level 2), Module A2: Food contact decontamination (level 1).



8 Migration limits of substances with restriction

- The product meets the requirements of Regulation (EU) No 10/2011, Regulation (EU) 2020/1245, Decree (CZ) No 38/2001 and Directive 94/62/EC.
- All results are within the limits of the EU and CZ Regulations.
- Upon request, we will provide a complete analysis of all tested substances according to the above-mentioned laws, as amended.
- Due to the use of post-consumer recycled PET, it is not possible to specify which exact substances subject to restrictions are present in the recycled materials. Therefore, a standard list of substances and standard simulants were used according to Regulation (EU) No 10/2011 and Decree (CZ) No 38/2001.
- Standard substances for testing:

Name of the substance	CAS No.	Restrictions (mg/kg)
Terephthalic acid (TPA)	100-21-0	max. 7.5
Isophthalic acid (IPA)	121-91-5	max. 5
Ethylene glycol (EG)	107-21-1	max. 30
Diethylene glycol (DEG)	111-46-6	max. 30
Antimony trioxide	1309-64-4	max. 0.04
Acetaldehyde (AA)	75-07-0	max. 6
1,4 Butandiol	110-63-4	max. 5.0
Tetrahydrofuran	109-99-9	max 0.6
4,4'-bis(benzoxazol-2-yl)stilbene	1533-45-5	max 0.05

- Migration testing is performed on finished articles using simulants:

Simulant	%	Time period	Temperature
acetic acid	3	10 days	60°C±2
Isooctane	x	10 days	60°C±2
ethanol	10	10 days	60°C±2
ethanol	95	10 days	60°C±2
olive oil	x	10 days	60°C±2

- Ratio of food contact to volume used: 600 cm²/l for acetic acid, ethanol and olive oil
- Ratio of food contact to volume used: 1000 cm²/l for isooctane



- We confirm that the substances and migration of substances listed below do not exceed limit, if tested under the specified conditions in Regulation (EU) No 10/2011 and Decree (CZ) No 38/2001:
 - Toxic elements according to Regulation (EU) No 10/2011, Decree (CZ) No 38/2001 and Directives 94/62/EC
 - overall migration according to Regulation (EU) No 10/2011
 - specific migration of monomers and additives according to Regulation (EU) No 10/2011 and Decree (CZ) No 38/2001
 - specific migration of metals Regulation (EU) No 10/2011, Annex II
 - specific migration of primary aromatic amines (PAAs) according to Regulation (EU) No 10/2011, Annex I
 - specific migration of polyaromatic hydrocarbons (PAUs) according to Regulation (EU) No 10/2011, Annex II
 - colour migration according to Decree (CZ) No 38/2001

9 Other substances

9.1 NIAS

- Non-Intentionally Added Substances (NIAS) might be present in products mentioned above.
- Based on the information provided by our suppliers, the assessment of the recycling plastic processes and other conducted investigations, these can be, e.g.:
 - Impurities present in the substances/intermediate products used in the manufacture of plastic materials or articles, which can originate from their manufacturing or extraction process.
 - Reaction and degradation products which might be formed during the manufacture and use of plastic materials and articles.
 - Relying to our suppliers' declarations of compliance as well as our own compliance work, we may confirm that known NIAS have been assessed in accordance with Article 19 of Regulation (EU) No 10/2011 and comply with Article 3.1 a) of Regulation (EC) No 1935/2004.
- Please note that downstream users are responsible for assessment of NIAS formed during further processing into final food contact materials or articles of the product(s) subject to this Declaration of Compliance to manufacture.



9.2 REACH

- Compliance with **Regulation (EC) No 1907/2006** concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency (ECHA), amending **Directive 1999/45/EC**.
- We duly note that the European Chemicals Agency updated the “Candidate List of substances of very high concern (**SVHC**)” every 6 months. We declare that we are following updates, latest on **21.1.2025**. (<https://echa.europa.eu/candidate-list-table>).
- This confirms that we will promptly notify you if any products including packaging we are supplying contain newly added substances to SVHC in excess of 0.1%, or if we determine that any such product(s) may be SVHC-contaminated.
- In addition, we confirm that if any product is shipped in packaged form, the packaging does not contain in total more than 100ppm of Lead, Mercury, Cadmium and Hexavalent Chromium and if it does, we will notify you of the content and the amount.

9.3 California Proposition 65

- The substances listed in the table below, which fall under the reporting requirements of the State of California Safe Drinking water and Toxic Enforcement Act of 1986, known as **California Proposition 65** (updated on 29.12.2023) can be present in our product.

Chemical	CAS No.
Acetaldehyde	75-07-0
Antimony oxide (Antimony trioxide)	1309-64-4
Ethylene glycol (ingested)	107-21-1

9.4 Dual-use additives

- According with Regulation (EU) No 10/2011 we inform that the additives which are used in production of PET (optical brightener, antiblocking agent, dyes etc.) may contain trace amounts of dual-use additives.
- The material may contain the following substances, so-called “dual-use substances”, governed by **Regulation (EC) No 1333/2008** and/or **Regulation (EC) No 1334/2008**:

Substance	CAS No.	Additive
Phosphoric acid	7664-38-2	E 338
Glycerol monostearat	123-94-4	E 471



9.5 Phthalates

- None of the Phthalates listed below in Regulation (EC) No 1907/2006 as amended Annex XVII, points 51-52 are intentionally added to the product:
 - Phthalate DEHP - Phthalate BBP - Phthalate DIDP
 - Phthalate DBP - Phthalate DINP - Phthalate DNOP

9.6 Epoxy derivatives

- According to **Regulation (EC) No 1895/2005** on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food, we declare that bisphenol A diglycidyl ether (BADGE) and its derivatives are not intentionally added to the product.

9.7 Bisphenol A (BPA)

- We declare that our product does not contain Bisphenol A (4,4'-Isopropylidenediphenol, CAS: 80-05-7). This substance is neither intentionally added to any of the ingredients used in this product, nor is it part of the product's formulation.

9.8 PFASs

- We declare that our product does not contain Per- and polyfluoroalkyl substances (PFASs). These substances are neither intentionally added to any of the ingredients used in this product, nor are they part of the product's formulation.

9.9 MOSH/MOAH

- We declare that **MOAH** (mineral oil aromatic hydrocarbons) and **MOSH** (mineral oil-saturated hydrocarbons) are not intentionally added to the product.



9.10 Cosmetic products

- According to **Regulation (ES) No 1223/2009** on cosmetic products, we declare that unintentional presence of a small amount of a prohibited substance was tested according Regulation (EU) No 10/2011 and no limits were exceeded for any substance.

9.11 Nanomaterial

- We declare that our product does not contain and we do not intentionally add substances or products containing any nanomaterials as defined by the **Commission Recommendation (EU) 2011/696** on the definition of nanomaterial. None of the additives used in our mentioned product contains particles in the size range of 1 nm - 100 nm at a level of 50% or more.

9.12 Allergens

- We declare that based on suppliers' information and the manufacturing process of our product, it is unlikely that substances listed in Annex II of the **Regulation (EU) No. 1169/2011** and in the **FDA Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA)** are present in the product.
- During manufacturing our resins we do not intentionally add substances or products causing allergies or intolerances to our product nor do our suppliers in the raw materials used. We states that no allergenic substances are allowed in any processing, packaging or warehousing environments.

9.13 GMOs

- We declare that according to **Regulation (EC) No 1829/2003** of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed our resin do not intentionally contain GMO (Genetically Modified Organisms) or GMO-derived components (such as DNA, protein). And is not produced using GMO-based raw materials.



10 Information related to the final use

- The recycled PET obtained from the process of rPET InWaste s.r.o is used at up to 100% for the manufacture of materials and articles for contact with all types of foodstuffs, including drinking water, for long-term storage at room temperature, with or without hotfill.
- PET material and articles can be used for long-term contact with all types of food exceeding 6 months at room temperature and below room temperature, including hot filling conditions and/or heating up to 70°C for 2 hours or 100°C for up to 15 minutes.
- The final articles made of this recycled PET are not intended to be used in microwave or conventional ovens.
- The manufacturer of the final product should verify that migration from the container does not alter the safety and composition of the packaged food. Downstream users putting the final article in contact with foods, (e.g., the filler - if he is not the manufacturer of the finished bottle) should verify whether the organoleptic characteristics of the packaged food are not altered.
- Our resin is to be considered as an intermediate product that must be transformed into containers of different thicknesses, shapes and sizes before being filled with various foodstuffs. In order to determine if the resin can be used for the intended application, the necessary testing or demonstration has to be performed by the final container manufacturer. For any specific and overall migration testing conducted, it is the responsibility of the final container manufacturer to determine the adequate simulants and testing times and temperatures relevant for the intended use of the final article.
- rPET InWaste s.r.o. cannot be held responsible in case its product was used for applications that are not covered by the above paragraph.



11 Additional information

- PET is recyclable for reuse in the same or other applications. The products comply with **Directive 94/62/EC**.
- For more information please visit: <https://www.rpet-inwaste.com/en/certification/>
- By receiving this declaration of compliance, the user of this product recognizes that it has received from rPET InWaste s.r.o. all necessary information available to rPET InWaste s.r.o. to enable him (the user) to ensure compliance with the applicable legislation. Should you need however any clarification, please feel free to contact us. In case you do not contact us upon receipt of this document, we assume the information provided in this document is fully satisfactory.
- The present declaration of compliance keeps its validity from the date of issue, unless there will be circumstances which cause the amendment of records of this declaration, for example the amendment of legal regulations or changing in technology which can have an impact on changing the properties of the product.
- This document has been created according to the instructions given in Article 16 of the EU food contact material Framework Regulation (EC) No 1935/2004, Regulation (EU) No 10/2011, attachment IV and Decree (CZ) No 38/2001, addendum V.


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