



Declaration of Compliance

For plastic food contact articles - APET and rPET EFSA registration

Last updated: 2026-08-28

Valid from: 2026-09-25

1. Issued / Manufactured / Imported by

Plus Pack Group
Odense (DK) / Genk (BE)

2. Identification of the product

Combination of materials (outside to inside)

Three-layer co-extruded PET film with ABA structure where A-layer from virgin PET and B-layer from recycled post-consumer material or virgin PET

Product reference(s)

Item number	Product Group	Technical Name
5005410201	Zen™	RPET.RECT.CLEAR

3. Compliance with food contact legislation

This item supplied by Plus Pack is intended to come into contact with the indicated foodstuffs and comply with the following EU Commission regulations and directives under the filling/treatment and storage conditions:

- Framework Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food of 27 October 2004, as amended on the above-mentioned date of last update, in particular articles 3, 15 and 17.
- Directive (EC) 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food with possible amendments.
- Regulation (EC) 10/2011 relating to plastic materials and articles intended to come into contact with foodstuffs and its latest amendments.
- Regulation (EU) 2024/3190 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonized classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) 10/2011 and repealing Regulation (EU) 2018/213
- 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) 282/2008.
EFSA registration : RECYC021 (for PET with B-layer from post-consumer material)
- Regulation (EC) 1169/2011 concerning absence of the listed allergens in Appendix II .
- Article 5 of Regulation (EU) 2025/40 on Packaging and Packaging Waste, Repealing 94/62/EC
- Directive (EC) 1907/2006 REACH (Registration, Evaluation and Authorization of Chemicals) with possible amendments.
- Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs), as amended.

4. Overall migration

This product complies with the overall migration limits, tested under conditions as defined in (EC) 10/2011. Test conditions from a higher OM level are excepted.

Simulant	Test condition	Result (mg/dm²)
10 % ethanol (simulant A)	10 days at 40°C (OM2)	Compliant
3 % acetic acid (simulant B)	10 days at 40°C (OM2)	Compliant
Olive oil (simulant D2)	10 days at 40°C (OM2)	Compliant

Plus Pack A/S
Energivej 40
5260 Odense S
Denmark

Telephone +45 65 50 60 00
Fax +45 65 50 60 40
Email info@pluspack.com
Website www.pluspack.com

ISO 9001/14001 certified
BRC Global Standard Packaging
CVR: DK 37 75 40 13

5. Substances with limits and restrictions

According to (EC) 10/2011 art 17(1) and art. 17(2)(a and b) the compliance of this (these) item(s) has (have) been assessed with a surface to volume ratio of 6 dm²/kg or with the actual surface to volume ratio. All specific migration limits are met. The item does not contain Primary Aromatic Amines according to Annex II of (EC) 10/2011.

FCM	CAS no.	Substance	SML (mg/kg)	Result (mg/kg)
128	0000075-07-0	acetaldehyde	6,0	
141	0000077-99-6	1,1,1-trimethylpropane	6,0	
254	0000110-63-4	1,4-butanediol	5,0	
785	0000100-21-0	Terephthalic acid	7,5	
291	0000121-91-5	Isophthalic acid	5,0	
227	000107-21-1	Ethyleneglycol	SML(T) = 30	
263	0000111-46-6	Diethyleneglycol		
398	0001309-64-4	Antimony trioxide	0,04	
NIAS	1000343-99-8	Isophthalic acid, ethyl 3-pentyl ester	1,8	
NIAS	0000636-09-9	1,4-benzenedicarboxylic acid, diethyl ester	60	
NIAS	0022163-52-6	1,4-benzenedicarboxylic acid, ethyl methyl ester	7,5	

6. Dual use additives

As required by Regulation (EC) 10/2011 the following table identifies substances used subject to a restriction in food through an authorization as food additive that might be present.

Food additive	Substance
E551	Silicon dioxide
E338	Phosphoric acid

7. Conditions of use

7.1 Regarding type or types of food

Intended for

Aqueous foods	Yes
Acidic foods	Yes
Alcoholic foods	Yes
Fatty foods	Yes
Dry foods	Yes

7.2 Regarding time and temperature of treatment and storage of food :

Any long-term storage at room temperature and below, including hot-fill conditions and/or heating up to 70°C ≤ T ≤ 100°C for maximum t = 120/2^{Δ(T-70)/10} minutes

7.3 Any other limitations of use :

Although the material is tested for hot-fill and heating up to 100°C, there are restrictions in temperature due to mechanical properties : During hot-fill and heating, the maximum allowed temperature is limited to 70°C due to mechanical stability of PET above this temperature.
(*) PET film which contains both PET recycle and virgin PET material, can become brittle at freezing temperatures.

Use in conventional oven	No
Use in microwave	No
Use for BBQ / Grill	No
Freezing	Yes
Storage after filling	-18°C(*) to + 40°C

8. Absence / presence of chemical substances

To the best of our knowledge and based on the information provided by our supplier(s), these compounds are not expected to be present in the above-mentioned product(s).

- **Mineral Oil Hydrocarbons (MOSH/MOAH)**
The food contact material/article is manufactured in accordance with applicable European Union requirements concerning Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH).
MOSH and MOAH are not intentionally added to the material/articles
- **Endocrine disruptors**
Substances classified as endocrine disruptors Category 1 for human health under Regulation (EC) No 1272/2008, substances identified as SVHC due to endocrine-disrupting properties under REACH are not intentionally used, unless specifically permitted by applicable EU legislation.
- **Bisphenol A (BPA) and Other Hazardous Bisphenols**
Bisphenol A (BPA, CAS No. 80-05-7) and its salts are not intentionally used in the manufacture of this material/article
- **Primary Aromatic Amines (PAA)**
The packaging material complies with the applicable requirements for Primary Aromatic Amines (PAA) under Commission Regulation (EU) No 10/2011, including the restrictions laid down in Annex II.
- **Phthalates**
The packaging material complies with the applicable requirements for phthalates under European Union legislation.
No phthalates are intentionally added unless their use is specifically authorised for the intended application under applicable European Union legislation.
- **POP**
Substances listed and restricted under the POPs Regulation are not intentionally used.
- **The packaging complies with Regulation (EU) 2025/40, Article 5**
 - SVHC / substances of concern: presence is minimised and applicable REACH requirements are fulfilled.
 - Heavy metals: the total concentration of Pb, Cd, Hg and Cr(VI) does not exceed 100 mg/kg. This requirement is carried over from the previous Packaging and Packaging Waste Directive 94/62/EC.
 - PFAS in food-contact packaging: PFAS is not intentionally added.
Compliance is supported by appropriate supplier documentation.

9. Inventory Storage

The articles should be stored in a clean and dry environment, protected from direct sunlight, chemicals, strong odours and extreme temperatures. Storage between 5 - 25°C and at maximum 70% RH.

Disclaimer

The information included in this document is based on the present state of our knowledge and is valid from the stated issue date until this document is superseded. Because of possible changes in the underlying legislation and regulations, as well as possible changes in this Product, we cannot guarantee that the status of this document will remain unchanged. It will be renewed in all cases where the previous conformity is no longer ensured.

The statement is based on documentation from Plus Pack suppliers of raw materials and goods. The declaration is indicative and applies to the product when used during normal and foreseeable conditions consistent with referred temperature-, time- and contact constraints.

Plus Pack will always assist in the choice of packaging, but the packer is ultimately responsible for choosing the right packaging for the product/process. The products must be tested until end of shelf lifetime by correct packaging trials to avoid process problems - product smell, taste or visual deformation of the total end-product. Re-use of the packaging is depending on both production process and product, and subsequently the re-use ability must be evaluated by the packer/producer.

Approved by the Quality Department.

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