

**(Regulatory / Food Contact ) Compliance Declaration**

1. GULF PACKAGING INDUSTRIES LTD – JUBAIL INDUSTRIAL P.O. BOX 1503 – AL JUBAIL 31951 – SAUDI ARABIA
- 3 GULF PACK Bi-axially Oriented Polypropylene (BOPP) Films: CF101; CF202; CF301; CF305; CF330; CF401; CF507; HF101; HF102; HF103; HF106; HF107; HF110; HF115; HF125; HF126; HF130; HF150; HF200; HF201; HF300; HF302; HF303; HF304; HF314; HF320; HF330; HF400; HF404; HF504; HF505; HF506; HF509; HF515; HF525; HM104; HM105; HM108; HM115; NM103; NF100; NF102; NF203; NF305; NF503.
- 4 Date : 28,Jul.2016 .
- 5 We declare that the above mentioned Gulf Pack BOPP films for packaging applications are suitable to come into contact with foodstuffs and in conformity with :
  - a) The Framework Regulation 1935/2004/EC.
  - b) Frame directive and Commission Regulation (EU) No. 10/2011 **and its successive amendment** 174/2015.
  - c) Regulation 2023/2006/EC, American 21 CFR 174.5 (GMP for food contact materials and articles intended to come into contact with food) FDA Section 21 CFR Ch. 175.300 and 176.170
  - d) All polymers and additives in the composition of above mentioned films appear in the positive list of products accepted for the fabrication of packaging materials intended for food contact, as published by the Food and Drug Administration (USA) FDA 21 CFR 177.1520(c)1.1a (Polyolefins)

**6 Overall Migration :**

The imported goods are in accordance with the specific migration testing and purity criteria in accordance with directives 2008/60/EC, 95/45/EC, 2008/84/EC.

Test Conditions

S/N	Test Simulants	EEC – Test Conditions	
		Temperature	Time
1	3% Acetic Acid	40 °C	10 Days
2	10% Ethanol	40 °C	10 Days
3	Olive Oil	40 °C	10 Days

Test Results

S/N	Test Simulants	EEC	
		EEC Limit	Results
1	3% Acetic Acid	10 mg/dm <sup>2</sup>	<1.5 mg/dm <sup>2</sup>
2	10% Ethanol	10 mg/dm <sup>2</sup>	<1.5 mg/dm <sup>2</sup>
3	Olive Oil	10 mg/dm <sup>2</sup>	<2.5 mg/dm <sup>2</sup>

**7 Specific Migration :**

All monomers and additives fulfill the requirements for food contact with following restriction. Some grades that can be used in the production of Gulf Pack films may contain the following substances subject to SML:

Substance Chemical Characterization	CAS-No	Ref-No	SML
Octadecyl 3-(3,5-Di-tert-butyl-4-hydroxyphenyl) propionate	2082-79-3	68320	6 mg/kg
N,N Bis (2-hydroxyethyl) alkyl (c8-c18) amine	- - -	39090	1.2 mg/kg
Phthalic acid, dibutyl ester	84-74-2	74880	0.3 mg/kg

Tetrakis (2,4-di-tert-butyl-phenyl)-4,4-bisphenylene diphosphonite	38613-77-3	92560	18 mg/kg
Maleic anhydride	108-31-6	19960	30 mg/kg
Bis (2,4-di-tert-butylphenyl) pentaerythritoldiphosphite	26741-53-7	38820	0.6 mg/kg

- 8 We declare that during the manufacture of above mentioned Gulf Pack BOPP films, GULF PACKAGING INDUSTRIES LTD. uses monomers, starting substances and additives subjected to the restrictions provided as by point 6 of the Annex IV of the Regulation (EU) No. 10/2011 (Annex I and II).

## 9 DUAL USE ADDITIVES :

With the present we certify that the GPIL Products Which may contain following food additives

Chemical Name	Cas or PM Ref Number	E Number
Mono/diglycerides of fatty acids	PM/Ref: 56486	E471
Synthetic silica	CAS no 7631-86-9	E551
GMS	CAS no 57600 -57680	E471

- Also , Some of our product may contain food additives like: (E551, E330, E470, E470a, E470b, E471 and E551)
- We declare also that none of the ingredients used during the production of said films contains substances that exceed the limits regarding Regulation 10/2011/EC.
- So the product does not comprise any "dual use" substances as mentioned by the European Directive 2008/60/EC,
- 95/45 EC, 2008/84/EC
- The product does not comprise any Mineral Oils.
- The product compliance with requirements of European Directive 90/128/EEC; European Directive 94/62/EC and
- following amendments; Commission Regulation (EC) No. 1895/2005; European Directive 2005/84/EC.
- The product compliance with requirements of Regulation (EC) No. 282/2008 relative to materials and articles made
- of recycled plastics intended to come into contact with foods amending Regulation (EC) No. 2023/2006.
- No heavy metals (i.e., antimony, arsenic, barium, cadmium, chromium, Hexavalent chromium, lead, mercury, selenium, or silver) are purposely added to these products in quantities that would violate governmental guidelines.

## 10 Phthalates Substances :

We declare that all types of BOPP films manufactured in our facility does not contain the following Phthalates substances :

"butyl benzyl phthalate (BBP), di-n-butyl phthalate (DBP), di-(2-ethylhexyl)phthalate (DEHP), di-iso-butyl phthalate (DIBP), di-iso-decyl phthalate (DIDP), di-isononyl phthalate (DINP)"

The raw materials used in the production of the BOPP films do not contain the said substances, as declared by the relevant raw materials suppliers.

Neither the said substances are intentionally added during the production of the OPP films, nor are they used, directly or indirectly, in the production process itself.

## 11 Heavy Metals :

The raw materials used in the production of said BOPP films, namely: PP homopolymers, copolymers, PP terpolymers, and masterbatches based on the above mentioned resins do not contain heavy metals such as cadmium, hexavalent chromium, lead, antimony, nickel, tin, arsenic, PBB, PBDE and mercury, as declared by the suppliers of the above mentioned raw materials.

- Neither the said heavy metals nor their compounds are intentionally added during the production of the said films, nor they are used, directly or indirectly, in the production process itself.

- Any incidental amount of heavy metals contained does not exceed 100 ppm (by weight). For these reasons, we hereby declare that the said films comply with the following regulations:

- A. USA CONEG REGULATION
- B. 2009/48/EC (Safety of toys)
- C. Directive 94/62/EC on packaging and packaging waste is amended by Directive 2004/12/EC.
- D. ROHS Regulation (2011/65/EC)
- E. WEEE Regulation (2002/96/EC)

## 12 Reach Regulation

Under the REACH regulation, all Gulf Packaging plastic film products are manufactured items obtained from polymers, and so exempted from the provisions of registration of Title II of REACH (Article 2(9)).

Our raw material suppliers confirm that all individual chemical substances used in the preparation of these polymers are compliant with the pre-registration requirements of REACH.

### **Absence of SVHC as published by ECHA (last updated :20,June,2016)**

Gulf Packaging Industries Ltd. declares that we do not intentionally use or add Substances of Very High Concern (SVHC) into our products.

The absence of these substances is not verified by analysis, therefore we cannot exclude that trace levels of these substances may be present.

The statement is valid for all above mentioned products delivered after June 2007, when REACH Regulation entered into force.

We declare that the above information applies to all unprinted, unconverted Gulf Pack BOPP films that leaves our production facilities and do not cover any additive, printing ink, adhesives, overprint varnishes and other substrates etc. that may be subsequently included by the converter/ user. Upon the expiration of this declaration or in case of regulation amendments, a new declaration can be provided upon request.

The complete SVHC list can be found at the following link:

<http://echa.europa.eu/web/guest/candidate-list-table>

## 13 Chemical List of Proposition:

We certify that during the production of our films, we do not use or intentionally incorporate into them, any of the chemicals as restricted by Chemical Lists of Proposition 65 of the State of California and subsequent amendments. Complete list can be downloaded from;

[http://www.oehha.org/prop65/prop65\\_list/files/P65single12272013.pdf](http://www.oehha.org/prop65/prop65_list/files/P65single12272013.pdf)

## 14 Absence of the Substances:

### **A) GMO – DIOXINE – RESTRICTIONS-ALLERGENS – RECYCLED RAW MATERIAL USAGE:**

According to the information received from our suppliers the additives and PP homopolymers, terpolymers and coating materials used for the production of said films do not contain any genetically modified organisms (GMO)

2003/11 EC (restrictions on the marketing and use of certain dangerous substances and preparations) : please refer absence list given below.

1895/2005 EC (restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food) : please refer absence list given below.

252/2012 EC (related with dioxine and dioxine related PCB's in the food chain) is not applicable to our products.



Our films do not contain any allergic substances and we hereby confirm that our film complies with 2003/89 EC.

Gulf Pack films are produced only from virgin resin and do not contain post-consumer recycled components, and no obligation exists under the 282/2008/EC

**B) We declare that in the manufacturing of the above mentioned products, we do not use or intentionally incorporate into it the following substances :**

Allergens (as defined in Directive 2000/13/EC, as amended) , Antimony , Aromatic amines , Asbestos , Acetyl acetone , Azodicarbonamide or semicarbazide compounds , Optical Brightening Object (OBA) “Azurant Optique” , Benzophenone, hydroxybenzophenone and 4-methylbenzophenone , Biocides , Bisphenol-A (BPA) and Bisphenol-F (BPF) , Bisphenol A bis(phthalic anhydride), CAS No. = 038103-06-9 , Brominated Flame Fetardants (BFR) , Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC) , Decabromodiphenyl ether (decaBDE) , 2-Ethylhexanoic Acid (2-EHA) , Di(ethylhexyl) adipate (DEHA) and di(ethylhexyl) maleate (DEHM) , Dimethyl Fumarate (DMF) , Dioxins and furans , Endocrine Disruptors listed in the Japanese authority list “Strategic Programs on Environmental” , Endocrine Disruptors '98 (SPEED '98) - Table-3: Chemicals Suspected of Having Endocrine Disrupting Effects , Natural rubber latex

**Epoxy derivatives:** (BADGE [2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether], CAS No. = 001675-54-3 , BFDGE [bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ether],

NOGE [novolac glycidyl ether] As defined in Directive 2002/16/EC amended by 2004/13/EC, repealed by the Regulation 1895/2005/EC , Epoxidised Soya Bean Oil (ESBO) )

Formaldehyde (Formol/Formalin) , GMO , Halogens and substances of Halogens , Heavy metals (Lead (Pb), Mercury (Hg), Cadmium (Cd) & Hexavalent of Chromium [Cr(VI)] , Isopropyl tioxanthone (ITX) , Latexes , Melamine and cyanuric acid , Mercapto mix , Nanoparticles / nanotechnology , N-ethyl-o,p-toluolsulfonamide (NETSA) (CAS nb 1077-66-1) , N-ethyl-p-toluenesulphonamide (NE-PTSA) (CAS nb 80-39-7) , Nonylphenol and its derivatives, Oxydegradable additives , Ozone-depleting chemicals (ODCs) Class I and Class II ODCs (as defined in Montreal Protocol) dealt in the Regulation 2037/2000/EC and following amendments. , Organo-tin compounds as tributyl-tin (TBT), dibutyl-tin (DBT), monobutyl-tin (MBT) , Pentabromodiphenyl ether, octabromodiphenyl ether , Perfluorinated tenside (PFT), Perfluorooctanoic acid (PFOA) & Perfluorooctane sulfonate (PFOS) listed in Directive 2006/122/EC , Poly(aromatic hydrocarbons) according to US Environmental Protection Agency Method 610 (EPA 610) , Polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), polybrominated terphenyls (PBTs) , Polychlorinated biphenyls (PCBs), polychlorinated terphenyls (PCTs), polychlorinated , naphtalenes (PCNs) , Polycyclic Aromatic Hydrocarbons (PAH) , Polyethylene Glycol (PEG) , Recycled products as defined by Regulation (EC) 282/2008 , Short chained chlorinated paraffin's , Silicone , Tert-butyl-4-hydroxyanisole (BHA) and 2,6-di-tert-butyl-p-cresol (BHT) , Thiuram mix , Titanium Acetyl Acetone (TAA) , Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) (CAS nb 3380-34-5) , Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC, ...)

Hence, we certify that Gulf Pack Bi-axially Oriented Polypropylene Film (BOPP) doesn't (carry/contains) above substances at all, right from raw materials supply till its manufacturing process on our plants.

We declare that the above information applies to all unprinted, unconverted Gulf Pack BOPP film that leaves our production facilities and do not cover any additive, printing ink, adhesives, over print varnishes and other substrates etc. that may be subsequently included by the converter/ user.

## 15 Specifications related to the use of the products:

- 1) The BOPP film is generally converted and it gets in contact with various alimentary products such as: Pasta, Chips and Crisps, Bakery products, Fresh vegetables, Chocolate and candies
- 2) The BOPP film maintains its proprieties from -25°C to + 60°C. The material under normal and reasonably foreseeable use (filling a dry product and fat at about 40 °C for a period of approximately 1 year) causes no unacceptable change in the composition or altered organoleptic characteristics.

3) The contact surface/alimentary product ratio may varies from less than 10% to over 60%

The industrial or commercial use of the materials indicated in this declaration is subject to verification of this conformity to current legislation as well as this technological suitability to the intended final use.

We declare that GULF PACK BIAXIALLY ORIENTED POLYPROPYLENE FILM (BOPP) doesn't use any functional barrier.

This declaration will be valid for one year starting from the date of issue.

**FOR GULF PACKAGING INDUSTRIES LTD.**

**Mahmoud Ahmed**  
**QMS Representative**

QMS/13/ 2014/ Rev No: 09

