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SUBJECT : « FOOD CONTACT STATUS – SPC SC »

This statement, relating to plastics materials and articles intended to come into contact with foodstuffs, applies to unprinted « SPC SC » films manufactured by PROPYPLAST in Retournac, France.
This statement is based in part on information received from our raw material suppliers.

This statement is valid for « SPC SC C » and « SPC SC W », thickness 60 to 65 microns.

1. EUROPEAN UNION :

PROPYPLAST confirms that materials and articles manufactured from « SPC SC » films, in accordance with good manufacturing practice and in accordance with our appropriate recommendations, comply with Article 3 of Regulation N°1935/2004/EC of the European Parliament and of the Council on materials and articles intended to come into contact with food.

Raw materials used for the manufacturing of « SPC SC » films comply with the compositional requirements of Commission Directive 2002/72/EC as amended by Commission Directives 2004/1/EC, 2004/19/EC, 2005/79/EC, 2007/19/EC, 2008/39/EC and 975/2009/EC.

▪ DUAL USE ADDITIVES :

Some substances classified in the dual use additive's list are presents in the raw materials used in the manufacture of « SPC SC » films :

- ⇒ Calcium stearate
- ⇒ E 171

▪ SPECIFIC MIGRATION :

Some substances subject to specific limitation under Commission Directive 2002/72/EC (as amended) are present in the raw materials used in the manufacture of « SPC SC » films :

- ⇒ N,N-Bis(2-hydroxyethyl)alkyl(C8-C18)amine (Annex : IIIB PM/REF N : 39090 -
Restriction : SML(T) = 1,2 mg/kg)
- ⇒ Lipophilic Substances for which the FRF Applies (Annex IVa Ref. n° 95360 -
Restriction : SML(T) = 5 mg/kg)

Specific migration testing has not been carried out for this substance as it can be shown by calculation that the amount in the film is so low that the projected migration into food (assuming 100% transfer) is below the migration limits.

PROPYPLAST has carried out overall migration tests on samples of « SPC SC » films representative of typical production using the appropriate test methods of the European Standard, EN1186. The tests were carried out using the conventional food simulants and results are as follows :

Test conditions	Simulant	Observations on the sample	Observations on the simulant	Mean value in mg/dm ²
10 days at 40°C	Acetic acid 3% (p/v)	No visible alteration	Limpid	< 1
10 days at 40°C	ethanol 50 % (v/v)	No visible alteration	Limpid	< 1
10 days at 40°C	Olive oil	No visible alteration	Limpid	< 1

Recall of the authorized maximal limits :

- for aqueous simulants : 10 mg/dm² with an analytical tolerance 2 mg/dm²
60 mg/kg with an analytical tolerance 12 mg/kg

- for fatty simulants : 10 mg/dm² with an analytical tolerance 3 mg/dm²
60 mg/kg with an analytical tolerance 20 mg/kg

Results of these tests indicate that « SPC SC » films meets the limit for overall migration stipulated in Article 2 of Commission Directive 2002/72/EC, under the conditions of use covered by the test conditions above.

These tests are not realized for each delivery.

It must be recognised that compliance with the overall migration, specific migration and compositional limits set out in Commission Directive 2002/72/EC (as amended) can be demonstrated only by tests carried out on the material of article in the finished state in which it will contact the foodstuff. The film user is responsible for verifying that the finished product comply with the applicable legislation.

2. FRANCE :

« SPC SC » films comply with the requirements of the « Arrêté du 2 janvier 2003 relatif aux matériaux et objets en matière plastique mis ou destinés à être mis au contact des denrées, produits et boissons alimentaires »

3. U.S.A. :

Food and Drugs Administration, Code of Federal Regulations :

Determination of extractable fraction in n-hexane and soluble fraction in xylene, following FDA specifications :

Extractable fraction in n-hexane, in g per 100 g (individual values of 3 trials)	Soluble fraction in xylene, in g per 100 g (individual values of 3 trials)
SPC SC C 60 : 2.4 2.3 2.1	SPC SC C 60 : 7.5 8.0 7.6
SPC SC W 60 : 2.6 2.8 2.7	SPC SC W 60 : 6.9 6.8 7.0

Recall of authorized limits set by paragraph 177.1520 : n-hexane : 6.4%
Xylene : 9.8%

Results of this test indicate that « SPC SC » films comply with the compositional requirements of US « Code of Federal Regulations (CFR), Title 21 », under the paragraphs :
21CFR§177.1520-« Olefin Polymers »
21CFR§178.3297-« Colorants for polymers »

These tests are not realized for each delivery.

« SPC SC » films are designed for« standard printing » and « in-mould labelling » application (« reverse printing » application is not covered). The film user is responsible for verifying the technological suitability of the film for his own intended application.

PROPYPLAST will not accept any liability for losses arising from the inadequate suitability of « SPC SC » films.

This certificate replaces all previous ones relating to this subject

The validity limit date of this certificate is fixed at December 31, 2010

Georges LAURENT
Quality Manager