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Declaration of Compliance (DoC) for Food Contact Material

Product: CGTECH-BCR-XX-REV 3.7S-Series Manufacturer: Competitive Green Technologies. Address: 7 Seneca Rd, Learnington, ON, Canada

Date of declaration: Jan 20th, 2021

NORTH AMERICA:

- Competitive Green Technologies confirms some ingredients and all additives used in CGTECH-BCR-XX-REV 3.7S-Series compliance with the Title 21 (21 CFR) Parts 175-178, Indirect Additives used in Food Contact Substances, used under the conditions are authorized by FDA regulations.
- Competitive Green Technologies confirms some ingredients used in CGTECH-BCR-XX-REV 3.7S-Series listed under Food Contact Notification (FCN) Inventory of Effective Food Contact Substance (FCS) Notifications and used under the conditions are authorized by FDA regulations.
- Competitive Green Technologies confirms all ingredients, additives, and manufacturing processes
 of CGTECH-BCR-XX-REV 3.7S-Series using nor natural rubber or natural latex compounds as
 defined in Title 21 CFR 801.437.
- Competitive Green Technologies confirms product do not contain, at the date of shipment or delivery, any hazardous substances as described in the RoHS Directive, to include: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), or polybrominated diphenyl ether (PBDE). Should incidentally levels of the above-mentioned materials be present, these levels conform to the allowable limits as described in the Directive; <1000 ppm (except for Cadmium, which is limited to <0.01% or <100 ppm).

EUROPE:

Competitive Green Technologies confirm all substances and additives used in manufacturing process of CGTECH-BCR-XX-REV 3.7S Series listed in from (EC) No 1935/2004 of 27, October 2004 and Regulation (EU) No 10/2011, And all regulations as 321/2011, 1282/2011,71183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/79,2018/213, 2018/831, 2019/37, 2019/988, 2019/1338 and 2020/1245: amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food. and any further amendments Regulation (EU) 865/2014. The following restrictions must be ensured:

• Migration:





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Competitive Green Technologies complies all migrated substances and articles shall not transfer their constituents to food simulants in quantities exceeding 10 mg/ dm2 overall by the testing results performed under condition OM6 listed in Chapter 3 Table 3 (EU) 10/2011 and amending Reg (EU) 2016/1416. Suitability of using CGTECH-BCR-XX-REV 3.7S Series has been shown for all food types under OM6 which intended Food stimulants A(Ethanol 10 % (v/v)), B(Acetic acid 3 % (w/v)),C(Ethanol 20 % (v/v)),D1(Ethanol 50 % (v/v))at a temperature exceeding 40°C

Substances that have Specific Migration Limits (SMLs):

Substance Name	FCM Number	SML mg/kg
Tetrahydrofuran	246	N/A
1,2-dihydroxybenzene	289	6
1,4-dihydroxybenzene	295	0.6

The explanation of the abbreviations:

SML = specific migration limit expressed in mg per kg food FCM No = unique identification number of the substance

Acetic acid (E260) and Benzoic acid (E213) which is regards as the dual use substances according to EC 1333/2008 and EC 1334/2008 and all amending regulations. Acetic acid and Benzoic acid are using as the quantum satis level and they may be contributed to food based on the use of CGTECH-BCR-XX-REV 3.7S Series as the food contact material with no impact of food status with respect to acetic acid levels or Benzoic acid levels.

• Heavy metal:

Competitive Green Technologies confirm CGTECH-BCR-XX-REV 3.7S Series do not contain following heavy metals: Cadmium, Chromium Hexavalent, Mercury, Lead.

• NIAS (Non intentionally Added Substance) or IAS:

Competitive Green Technologies confirm CGTECH-BCR-XX-REV 3.7S Series do not contain any toxicological hazard from Non intentionally Added Substance (NIAS) or IAS as per the restrictions from Article 3 of Regulation (EU) No 1935/2004 and Article 19 of the Regulation (EU) 10/2011.

- Besides Compliance for Regulation (EU) 10/2011 and all amending regulations of Regulation (EU) 10/2011, Competitive Green Technologies confirm CGTECH-BCR-XX-REV 3.7S do not contain following chemical substances:
 - 1. Phthalates.
 - 2. Bisphenol (BPA)
 - 3.Latex
 - 4. Perfluorochemicals (PFCs, PFOA, PFOS)
- Competitive Green Technologies confirms there is no animal derivates involved or used in our manufacturing of CGTECH-BCR-XX-REV 3.7S Series.
- Competitive Green Technologies confirms CGTECH-BCR-XX-REV 3.7S Series are in compliances with ROHS2 Directive 2011/65/EU and it is amending regulation.





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- CGTECH-BCR-XX-REV 3.7S Series could be used safely as food contact article under precondition that complying with the use described in relevant regulations.
- Competitive Green Technologies confirms CGTECH-BCR-XX-REV 3.7S Series follow the substances list as Substances of Very High Concern (SVHC) latest version of the Candidate List of 25th, June 2020 that there is not intentionally formulated to contain the substances listed or any other CMR 1/2, PBT or vPvB substance in concentrations >0.1% (w/w).

Xue (Snow) Bai | Lead – Supplier Development and Laboratory and Quality Engineer

