superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

17.03.2026

TO WHOM IT MAY CONCERN

DECLARATION OF COMPLIANCE

Superior Packaging is an extrusion, printing and flexible packaging converting company supplying products for the food (direct and indirect contact), hygiene-sensitive, industrial and domestic markets.

We hereby confirm that the materials used in our products are compliant with FDA and / or EU regulations for food contact applications, when used unmodified and according to intended use. All raw materials used are virgin materials. No recycled products are used in the manufacture of food contact packaging.

As a BRCGS Packaging Materials certified company, all our products are produced according to good manufacturing practices and are stored in areas where any potential cross contamination by allergens, glass, brittle plastic, metal, chemicals and pest infestation, is minimized and controlled.

None of the materials used in the manufacture or supply of our products contain heavy metals, chlorates, pesticides, ammonia-based compounds, hydrocarbons (MOSH; MOAH), fluorated compounds or phenolic substances. Although this list is not exhaustive, any emerging risks or changes to legislation pertaining to the country of sale, are monitored, and controlled accordingly. As the manufacturer and supplier, we declare that the specified products are compliant with all applicable regulatory requirements pertaining to the products.

We, Superior Packaging Industries (Pty) Ltd, hereby declare that our products do not contain any intentionally added Per- and Polyfluoroalkyl Substances (PFAS) or Bisphenol A (BPA). This declaration is based on information from our suppliers and is compliant with all relevant regulations and reporting requirements. Our suppliers' declarations confirms that no PFAS or BPA are used in the production of the materials we utilize.

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Polyethylene products

Sold in reel or bag form as primary packaging to the fresh produce market.
Sugar bags/ Rice bags/ Dog food bags for the packing of various weights of product. The bag is designed to absorb impact if it is dropped.
Milk packaging is sold in reel form. Flexibility of the polyethylene allows for shock absorption if product is dropped.
Not suitable for heating and hot holding. Poor stacking practices during storage may result in bags compressing and difficulty in separating.
No defined shelf life. 1 year is specified to customer as poor or prolonged storage may result in bags compressing and not separating or discoloration.

Paper products

Restrictions apply for any non-specified use as the packaging has not been analysed for such an occurrence.
Not suitable for heating and hot holding. Poor stacking practices during storage may result in bags compressing and difficulty in separating.
No defined shelf life. 1 year is specified to customer as poor or prolonged storage may result in bags compressing and not separating or discoloration.

Reel stock used in the processing applications includes:

Polyethylene Film

Superior Packaging Industries (Pty) Ltd hereby declares that all printed and unprinted Mono layer LDPE bags, multi-layer structures containing BOPP (Biaxially Oriented Polypropylene), CPP (Cast Polypropylene), and LDPE films comply with the legal regulations as specified in regulation EC no 1935/2004, (EU) No 10/2011 and amendments including (EU) 2020/1245, when used as intended. Furthermore, the films comply with Commission Regulation (EC) 2023/2006 and with FDA regulation 177.

Legal Compliance Statement

We hereby declare that the product described above is in conformity with:

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food.
- Regulation (EC) No 2023/2006 on good manufacturing practice (GMP).
- Regulation (EU) No 10/2011 (and its amendments) on plastic materials and articles.
- EuPIA Guidelines regarding printing inks applied to the non-food contact surface.

superior packaging
INDUSTRIES (PTY) LTD
Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Dual-Use Substances

The following substances, which are authorised as food additives (Regulation (EC) No 1333/2008) or flavourings (Regulation (EC) No 1334/2008), are present in this packaging:

- **Antioxidant**: BHT (E321)
- **Slip Agent**: Erucamide (FL 09.135): Slip Agent / Flavouring
- **Metals:** Iron (E 173), Copper (E 141), and Zinc (E 650): Colourant or Flavour Enhancers.

Detailed Food Contact Parameters

- Type of Food: Specifically designed for unprocessed fruits and vegetables.
- Tested Food Simulants: Compliance has been verified for the following food contact applications.
    - Aqueous (Water-based) Foods: Verified via Simulant A (10% Ethanol) – 10days at 20°C.
    - Milk, Dairy, and Alcoholic Foods: Verified via Simulant D1 (50% Ethanol) – 10days at 20°C.
- Time and Temperature Conditions:
    - Testing Condition: 10 days at 20°C.
- Migration Limits:
    - Overall Migration (OM): Tests confirm results are below 10 mg/dm².
    - Surface-to-Volume Ratio: Compliance is verified based on the standard ratio of 6 dm²/kg of food.

Substances with Specific Migration Limits (SML)

The material contains substances subject to SMLs (including Caprolactam, EDA, HMDA, BPA, and Annex II Metals). Laboratory reports verification confirms that migration levels are significantly below the legal limits.

Summary: Specific Migration (SML) of Dual-Use Additives

Substance Name	ID (E-Number)	Standard / validated methods	Measured Values (mg/kg)	SML (Legal Limit)	Status
BHT	E 321	ASTM D6042 2009	< 0.0005	3.0 mg/kg	Pass
Erucamide	FL 09.135		< 0.0005 to < 1.37	60.0 mg/kg	Pass
Iron	E 172	In-house method 17/2014	< 0.1	48.0 mg/kg	Pass
Copper	E 141		< 0.1	5.0 mg/kg	Pass
Zinc	E 650		< 0.1	5.0 mg/kg	Pass

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Summary: Overall Migration Limits

Product Description	Food Simulant	Test Conditions	Standard / validated methods	Measured Value (mg/dm²)	Status
Green LDPE Liner	A (10% Ethanol)	10 days @ 20°C	BS EN 1186-5 2002	< 0.53	Pass
Printed Laminated Sheeting	D1 (50% Ethanol)	10 days @ 20°C		< 0.32	Pass
LDPE Bags	A (10% Ethanol)	10 days @ 20°C		< 0.01	Pass
Printed Laminated Polyester (PET)	D1 (50% Ethanol)	10 days @ 20°C		< 0.34	Pass

Specifications for Use
The bags are intended for direct contact with whole, unprocessed produce. They are not suitable for use in conventional ovens, microwaves, or for cooking applications.

Superior Packaging, to the best of its knowledge, and based on the results of independent analysis, believes that the information provided above, is accurate and correct.

Polypropylene Film
The films comply with EPRS Framework Regulation EC no 1935/2004, EC no 72/2002, supported by (EC) 2023/2006 and FDA Regulation 21 CFR 177.1520 (Olefin Polymers) and is therefore suitable for packaging in contact with food stuffs. (EU) No 10/2011 and amendments including (EU) 2020/1245; have been applied for specific migration levels.

Polyester Film
The films are manufactured in accordance with EC Regulations 1935/2004; EC no 72/2002, supported by (EC) 2023/2006, (EC) 450/2009; (EU) No 10/2011 and amendments including (EU) 2020/1245. The material is compliant with FDA CFR 177.1630 (a, e, f, g and h)

Regarding REACH status: The materials do not contain any substances specifically identified as SUBSTANCES OF VERY HIGH CONCERN.

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Product verification

The migration factors, barrier properties, heavy metals, and phthalates, for the Monolayer and Dual laminated materials have been independently tested and confirmed to be within the acceptable safety limits as specified by (EU) No 10/2011 and (EU) 2020/1245.

Compostable biopolymers

Compostable resins are certified biodegradable materials that meet international standards for compostability, including: ISO16929, ISO 14855; EN13432; USA Standard ASTM D6400, AS 4736 and Japanese "GreenPla" Standard, certified by Japan Bioplastics Association (JBPA). The resin is derived from non-GMO corn starch which is suitable for the manufacturing of film-type products. It can be directly used in the film blowing process. It does not contain any non-degradable polymers such as PE, PP, PS and PVC. An SANAS Accredited Laboratory testing shows that after decomposition, the product does not leave any harmful residues. In addition, the resin has been tested for heavy metals, toxicity to soil, plants and earthworms as per the requirements of the relevant regulatory standards as listed above.

Paper products

Paper used in the manufacture of Grape Wrap (wet strength material) is compliant with FDA Regulation CFR 21, 176:170 and / or 1935/2004/EC and compliant with 1895/2005 EC regarding heavy metals (Lead, Chromium, Cadmium, Mercury, Nickel). Paper products comply with EU10/2011 with regards to OML & SML migration for the tested simulants under the test conditions.

- Citrus Wrap and Sultana Top Sheets (MGBK Tissue) are compliant with 1935/2004 CE and FDA 21 CFR Ch 1 176:.170 and 176.180. The Wrappers, Agrishield and Sultana Top Sheets are also compliant with EC Directive 1895/2005. Regulation (EC) No 2023/2006: Good manufacturing practice (GMP) for materials in contact with food.

We hereby declare that the product described above is in conformity with the following EU regulations:

- BfR Recommendation XXXVI (Paper and Board): As there is no specific EU harmonised measure for paper, we comply with the German BfR Recommendation XXXVI for paper and board.
- EuPIA Exclusion List: All printing inks are formulated according to the EuPIA (European Printing Ink Association) Guidelines and do not contain substances on the Exclusion List.

Specific Migration and Dual-Use Additives

Migration of restricted substances is well below the Specific Migration Limits (SML). The following Dual-Use Additives (authorised as food additives / flavouring) are present:

- **Antioxidant:** BHT (E321)
- **Slip Agent**: Erucamide (Flavouring)
- **Metals**: Iron (Fe), Aluminium (Al), Zinc (Zn), Copper (Cu).

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Detailed Food Contact Parameters

- Type of Food: Specifically suitable for unprocessed fruits and vegetables (e.g., citrus, apples, stone fruits).
- Tested Food Simulants:
  - Simulant E (Tenax®): Specifically used for dry/non-fatty foods like whole fruits to simulate migration into solid matrices.
- Time and Temperature Conditions:
  - Condition: Up to 10 days at 40°C (covers ambient storage and transport) or below; high temperature (up to 100°C) for filter grades.
- Migration Limits:
  - Overall Migration (OM): Verified to be below 10 mg/dm² (or 60 mg/kg food).
  - Surface-to-Volume Ratio: Compliance is verified based on the standard ratio of 6 dm²/kg of food.

Summary: Specific Migration (SML) of Dual-Use Additives

Substance Name	ID (E-Number)	Standard / validated methods	Measured Values (mg/kg)	SML (Legal Limit)	Status
BHT	E 321	ASTM D6042 2009	< 0.0005	3.0 mg/kg	Pass
Erucamide	FL 09.135		< 0.0005 to < 1.37	60.0 mg/kg	Pass
Iron	E 172	In-house method 17/2014	< 0.1	48.0 mg/kg	Pass
Copper	E 141		< 0.1	5.0 mg/kg	Pass
Zinc	E 650		< 0.1	5.0 mg/kg	Pass
Aluminium	E 173		< 0.1	1.0 mg/kg	Pass

Summary: Overall Migration Limits

Product Description	Food Simulant	Test Conditions	Standard / validated methods	Measured Value (mg/dm²)	Status
Printed Paper	A (10% Ethanol)	2 hours @ 100°C	BS EN 1186-5 2002	< 0.06	Pass
Filter MGBK	E (Tenax)	10 days @ 40°C		< 0.45	Pass
Printed MGBK	E (Tenax)	10 days @ 40°C		< 0.10	Pass
Agrishield	E (Tenax)	10 days @ 40°C		< 0.77	Pass
Citrus Printed	E (Tenax)	10 days @ 40°C		< 0.10	Pass
MGBK	E (Tenax)	10 days @ 40°C		< 0.10	Pass
Filter	E (Tenax)	10 days @ 40°C		< 0.10	Pass

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

The filter towelling used in the manufacture of MAM sheets is compliant with FDA Regulation CFR Ch1 176:170 and has been tested for and complies with the EC Directive 1895/2005
Our material Suppliers are all FSC (Forest Stewardship Council) certified and have declared that their paper is free of Anthraquinone and that it is not used at any point in their process.

All clean, dry unlaminated paper products, are suitable for recycling.

Ink System
The inks used for printing comply as follows:

Food and Drug Administration Regulations:
The dry film resin components are approved under the US FDA Administration regulations for indirect food contact application where components are separated from product by means of a functional barrier.

Heavy Metals: (Lead, chromium, cadmium, mercury, nickel)
The supplier does not supply any packaging printing inks that contain pigments based on heavy metals.

General Exclusion list for Printing Inks and Related Products of CEPE:
Inks supplied do not contain those materials excluded by the criteria or by specific description on this list. This excludes from use all materials classified according to the EC Dangerous Substances Directive: 67/548/EEC, as toxic or very toxic, including carcinogenic, mutagenic, and toxic for reproduction.

Water-based ink system
Non-hazardous, Non-flammable, Flexographic water-based printing inks composed of synthetic resin with organic pigment inks for paper and tissue application.

REACH
Substances of Very High Concern or restricted according to Annex XIV or XVII of 1907/2006/EC are not used by the Supplier in the printing inks for packaging.

EuPIA
The supplier states that those raw materials excluded by the EuPIA are not used in their formulation. The inks are manufactured according to EuPIA Good Manufacturing Practices.

Adhesives
The laminating adhesive complies as follows:
European Regulation EC No 1935/2004 (Framework Regulation)
European Directive EC No 2011/8 on Plastics Materials and Articles.
US Regulation FDA 21 CFR 175.105: Adhesives intended for use as components of articles intended for use in packaging, transporting, or holding food.

superior packaging
INDUSTRIES (PTY) LTD

Reg No. 2002/015259/07
24 Old Mill Road, Ndabeni, South Africa, 7405
P O Box 869, Howard Place, South Africa, 7450
Tel: +27(0) 21 531-6634,
www.superiorpackaging.co.za

Regulation 2008/39/EC is met subject to correct application and storage by the Converter (as per the technical data sheet).

Glue Paste

The glue paste used in the manufacture of the paper grape bags is compliant with Code 21 of the FDA Regulations 175.105 declaring suitability for indirect food contact. A signed declaration of Chemicals of high concern is on record.

In addition to the above, we further confirm that all products supplied will meet our customer specifications and every pack unit will have full traceability through batch control. Supporting documentation verifying the claims made in this statement, are available on request.

This document is valid for 1 year from date of signature.

Signed:

Position: Director

Date: 17/3/2026.

Signed:

Position: Managing Director

Date: 17/03/2026