

Food Contact Declaration of Compliance

EC No 2022/1616 ANNEX III

Part A: Declaration of compliance to be used by recyclers

DMM-SXXX

RECYCLERS DECLARATION of COMPLIANCE with REGULATION (EU) 2022/1616

I, the undersigned, declare in the name of [Veolia ES Plastics UK Limited] as identified in section 1.1, that the recycled plastic material identified in section 1.2 was produced in accordance with Regulation (EU) 2022/1616. The recycled material to which this declaration applies is suitable for use in contact with food, provided it is used in accordance with the restrictions set out section 3 of this declaration, and with the instructions in this declaration and with the labelling on the product.

Hereby I declare that the contents of this declaration is correct to the best of my knowledge and in compliance with Regulation (EU) 2022/1616

For England, Scotland and Wales, hereby I declare that the contents of this declaration are correct to the best of my knowledge and in compliance with:

England (SI 2012, No. 2619) as amended

Scotland (SSI 2012, No. 318) as amended

Wales (SI 2012, No. 2705 (W.291)) as amended

(EC) 282/2008 as amended by (SI 2020,1504)

(EC) 10/2011 as amended by (SI 2020,1504)

Section 1: Identification						
1.1 Recycler		1.2 Recycled product		1.3 Competent authority		
1.1.1 Name	Veolia ES Plastics UK Limited	1.2.1 Tradename / designation		olia Food rade rHDPE	1.3.1 Name	FSA
1.1.2 FCM-RON*	UKO-8K1-0O8	1.2.2 Batch No.	В	XXXXX	1.3.2 Address	Floors 6 and 7, Clive House 70 Petty France London SW1H 9EX
1.1.3 Country	England	1.2.3 FCM-RIN*	Li: UI Li: UI	XO-1AH-0IH - ne 1 XO-0XA-0IH - ne 2 XO-4OJ-0I1 - ne 3	1.3.3 Country/ region	England
1.1.4 FCM-RFN*	UKO-35P-0FT	1.2.4 Other information	N/	A	1.3.4 assigned Registrat ion Number	13023462
Section 2: Compliance						
2.1 Basis for authorisation or permission to operate (tick one box only)						
2.1.1		Authorisatio Decision	n	RAN*		

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2.1.2		Recycling	RSN*		
		scheme			
2.1.3		No			
		authorisation	1		
		or recycling			
		scheme			
		required			
2.1.4		Novel	NTN*		Unassigned
		technology			
2.2 Results of	compliance assessment	as listed in the	e compulsory qualit	y assessme	nt stages in table
3.1 of Annex II;	compulsory only if 2.1.1	ticked			
Important: Fiel	ds 2.2.2 to 2.2.4 may be	left blank, prov	vided field 2.2.5 is ti	cked	
Stage**	Decision criteria and outcome(s) Batch Number(s)			nber(s)	
2.2.1 Exit	✓ TRACEABILITY - PASSED BXXXXX			•	
	✓ MIGRATION EC 10/2011 - PASSED				
	✓ LABELLING - PASSED				
2.2.2 Entry					
2.2.3 Input					
2.2.4 Output					
2.2.5 The undersigned confirms that the information required in fields □ ✓					
2.2.2 to 2.2.4 will be made available to competent authority upon its					
request, within 3 working days					
Section 3: Instructions and information to users of the product					
3.1	Instructions to converters				
3.1.1	Maximum recycled	% 40			
	content (w/w%)				
3.1.2	Present recycled	%	100		
	content (w/w%)				
3.1.3	Restrictions of	Milk bottle ar	oplication storage \le \	30 days at	≤ 20 °C
	use***		<i>U</i> –	•	

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3.1.4 Other instructions

The plastic materials or articles, products meet the relevant requirements laid down in EC No.10/2011 (including amendments up to EC No. 2025/351) and in Article 3, 11(5) and 15 and 17 of Regulation (EC) No 1935/2004.

EU Regulation 10/2011 Article 12

Overall Migration Limits: PASSED <10 mg/dm²
(Measured on 100% rHDPE using EN 1186-3)

Area = 1.0 dm². Test conditions 40°C for 10 days
Simulants:

D1 = 50% ethanol <1.0 mg/dm²

EU Regulation 10/2011 Article 18 Specific Migration Limits: PASSED (Measured on 100% rHDPE)

Compliance to EC No 10/2011 verified in triplicate using $0.42 \text{ dm}^2 / 0.035 \text{ kg} = 12 \text{ dm}^2/\text{kg}$ and reported to $6 \text{ dm}^2/\text{kg}$ for each batch. Test time 4 hrs, Test temperature 55 °C. Simulant D1 (50 % EtOH)

CAS	Name	mg/kg	FCM
5989-27-5	Limonene	< 0.017	(Class I)
112-41-4	1-Dodecene	< 0.008	268
31570-04-04	Irgafos 168	<0.040	671
2082-79-3	Irganox 1076	<0.181	433
6259-76-3	n-Hexyl salicylate	< 0.045	(Class II)
5444-75-7	2-Ethylhexyl benzoate	<0.049	(Class I)
101-86-0	α-Hexyl cinnamaldehyde	<0.045	(Class II)
110-27-0	Isopropyl myristate	< 0.150	(Class I)
142-91-6	Isopropyl palmitate	<0.040	(Class I)
109-43-3	Dibutyl sebacate	<0.181	242
	Unknown	< 0.010	

Cramer-Class I SML: 0.333 mg/kg Cramer-Class II SML: 0.100 mg/kg

Heavy Metal Element Migration Limits: PASSED

EU Regulation 10/2011 Article 10 Annex II

EN1186-1,3 Simulant 50% EtOH, conditions of use: Any long term storage at room temperature or below, including heating

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up to 70°C for up to 2 hours, or heating up to 100°C for up to
15 minutes.

Element	Average	SML
	(mg/kg)	(mg/kg)
Al	0.00067	1
Sb	< 0.0001	0.04
As	< 0.0005	ND
Ва	< 0.0001	1
Cd	< 0.00012	ND (LOD 0.002)
Ca	0.06167	No limit
Cr	< 0.001	ND
Co	< 0.0001	0.05
Cu	< 0.0001	5
Eu	< 0.005	0.05
Gd	< 0.005	0.05
Fe	< 0.001	48
La	< 0.0001	0.05
Pb	<0.00010	ND
Li	< 0.0001	0.6
Mg	0.00067	No limit
Mn	0.00035	0.6
Hg	< 0.0001	ND
Ni	< 0.001	0.02
K	0.0055	No limit
Na	< 0.005	No limit
Tb	< 0.0001	0.05
Zn	< 0.00083	5

https://dagenhamplastics.veolia.co.uk/

https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.201 5.4016.

(Each batch is made from at least 99 % of post consumer HDPE bottles having been previously used in food applications)

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	Each batch may also be accompanied by a certificate of analysis containing additional customer specific quality data. No substances listed on (EC) 1907/2006 (REACH) Annex
	XVII (restricted) or Annex XIV (SVHC) are added or used during the recycling process.
	No Per- and polyfluoroalkyl substances (PFAS), Polycyclic Aromatic Hydrocarbons (PAHs), Mineral Oil Aromatic Hydrocarbons (MOAH), UV additives or heavy metals are added or used during the recycling process.
Instructions to use	rs further down the supply chain, including end users
3.2.1 Restrictions of use***	Milk bottle application
3.2.2 Summary of labell	RFN,RIN, Batch No and food compliance symbols
3.2.3 Other instructions	The plastic materials or articles, products meet the relevant requirements laid down in EC No.10/2011 (including amendments up EC No. 2025/351) and in Article 3,11 and 15-17 of Regulation (EC) No 1935/2004. Compliance to EC No 10/2011 verified in triplicate using 0.42 dm2 / 0.035 kg = 12 dm2 /kg and reported to 6 dm2/kg for each batch. https://dagenhamplastics.veolia.co.uk/https://efsa.onlinelibrary.wiley.com/doi/pdf/10.2903/j.efsa.2015.4016 Each batch may also be accompanied by a certificate of analysis containing additional customer specific quality data.
Section 4: Signature	
4.1 Signature and company stamp	VEOLIA
4.2 Name of person signing	Diran Edwards
4.3 Role/position of person signing	Quality & Compliance Manager
4.4 Date and place	XX/XX/XXXX Dagenham, England

^{*} RAN – recycling authorisation number; RON – recycling operator number (recyclers); RIN – recycling installation number; RSN – recycling scheme number; NTN – novel technology number; RFN – Recycling facility number.

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** Filling out the fields for the exit stage (the batch that is placed on the market and which is accompanied by this declaration) is compulsory. The completion of the other fields is voluntary, but in case this information is not provided by means of this declaration, it shall be made available to a competent authority, upon its request, within three working days.

*** Restrictions of use shall correspond to any applicable conditions in the field of application of the recycled plastic, in accordance with Annex I for the applied technology, Article 7, 8, or 9, the Authorisation of the recycling process, if any, or any other restriction the recycler deems necessary.

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