



**TotalEnergies**

**TotalEnergies OneTech Belgium**

Refining & Chemicals / Regulatory Affairs  
[rc.fer-regaffairs@totalenergies.com](mailto:rc.fer-regaffairs@totalenergies.com)

Page 1 of 4

**CERTIFICATE N° 23-ARP-C-0686**

Feluy, October 2, 2023

POLYSTYRENE GPPS 1540 grade as produced in Europe

**STATEMENT OF COMPLIANCE FOR FOOD CONTACT APPLICATIONS IN EUROPE**

**1. Commission Regulation (EU) No 10/2011**

We confirm that the above-mentioned Product fulfils the requirements on plastic materials and articles intended to come into contact with food as described in the Regulation (EU) No 10/2011 as amended up to the Regulation (EU) 2023/1627<sup>1</sup>. The Product can be lawfully marketed and used in all member states<sup>2</sup>.

**1.1. Restrictions and/or migration limits:**

This Product may contain intentionally added substances with specific migration limits and/or restrictions defined in Annex I of Regulation (EU) No 10/2011 as amended up to the Regulation (EU) 2023/1627: more information in section 2.

Experimental tests and/or theoretical calculation of migration carried out on the above-mentioned Product (or a specimen representative of this material) covering long term storage at room temperature or below, including when packaged under hot-fill conditions, and/or heating up 70 °C for up to 2 hours, or heating up to 100°C for up to 15 minutes<sup>3</sup> with simulants A, B and D2 (single use, the Product used at 100% and thickness up to 250 µm applying a surface to volume ratio of 6 dm<sup>2</sup> per kg of food<sup>4</sup>) have shown that the overall and if relevant the specific migration limit(s) - including those related to the metals of Annex II – were not exceeded.

For other specific conditions of use, not covered above, it pertains to downstream users to check by appropriate overall and/or specific migration tests on the final material or article the suitability for contact with different food-types and various end-use conditions. However, these are beyond the control of TotalEnergies OneTech Belgium and are a part of the responsibility of the user of the above-mentioned Product.

**1.2. Dual use additive:**

We inform you that the above-mentioned Product may contain substance(s) defined as dual use additive(s)<sup>5</sup> : more information in section 2.

**1.3. NIAS:**

TotalEnergies is aware of the legal requirements of Regulations (EC) No 1935/2004 and (EU) No 10/2011, namely materials and articles coming into contact with food shall be manufactured so that they do not transfer their constituents to food in quantities that could endanger human health or bring about unacceptable change to the composition of the food. It does include both constituents intentionally added and non-intentionally added substances (NIAS).

<sup>1</sup> To meet the requirements of Regulation (EU) 10/2011 Annex IV (6) we are continuously performing analytical tests and questioning our suppliers regarding the presence of targeted substances. This declaration has been established to the best of our knowledge and based on the available information at the time of edition of this document. A new document will be edited if new evidence on the subject changes our statement.

<sup>2</sup> For some ingredients not harmonized in EU level, the mutual recognition principle could have been used.

<sup>3</sup> For other temperature, you may use the formulation included in Table 3 of Chapter 3 of Regulation (EU) No 10/2011:  $T$  where  $70\text{ °C} \leq T \leq 100\text{ °C}$  for a maximum of  $t = 120/2^{(T-70)/10}$  minutes.

<sup>4</sup> For the risk assessment, TotalEnergies uses an assumption that a 60 kg person may consume daily up to 1 kg of food in contact with the relevant food contact material. For the details, see EFSA Journal 2012;10(3):2579 (doi:10.2903/j.efsa.2012.2579).

<sup>5</sup> As defined in article 11 (3) of Regulation (EU) No 10/2011.

Issued by an electronic system

Zone Industrielle C – B-7181 Seneffe (Feluy)  
Tél. : +32 (0)64 51 41 11 – E-mail : [research-feluy@totalenergies.com](mailto:research-feluy@totalenergies.com)

SA TotalEnergies OneTech Belgium NV  
RPM Charleroi 0438.021.316 T.V.A. BE 0438.021.316 – BNP Paribas Fortis IBAN BE48 2100 4738 2027 BIC GEBABEBB



**TotalEnergies**

**TotalEnergies OneTech Belgium**

Refining & Chemicals / Regulatory Affairs  
[rc.fer-regaffairs@totalenergies.com](mailto:rc.fer-regaffairs@totalenergies.com)

Page 2 of 4

**CERTIFICATE N° 23-ARP-C-0686**

Feluy, October 2, 2023

POLYSTYRENE GPPS 1540 grade as produced in Europe

To the best of our knowledge and based on the information received from our suppliers, you will find in section 2 relevant information needed to establish your risk assessment under article 19 and Annex IV (6) of Regulation (EU) No 10/2011 as amended up to (EU) 2023/1627.

**2. Relevant information required by Regulation (EU) No 10/2011**

<b>Substances under restriction as mentioned in the Regulation (EU) No 10/2011 Annex I, Annex II and/or Annex IV (6)<sup>1</sup></b>			
<b>Substances</b>	<b>Maximal Residual Level (ppm)</b>	<b>FCM Reference No or CAS RN</b>	<b>Specific Migration Limit or Restriction (ppm)</b>
Styrene	500	193	None
Acetaldehyde	Traces*	128	6 (SML(T)) Group 1**
Stearic Acid, Zinc salt	850	106	5 (SML) as per Zinc

\* Non-Intentionally Added Substances – impurities, reaction products or others - with restrictions as mentioned in Commission Regulation (EU) No 10/2011 and/or national legislations may be present. The presence of these substances might depend on processing conditions. Therefore, we are not able to give a typical quantity of these substances occurring after processing of the polymer in your specific conditions of use. Some traces could be present in our resin, but to the best of our knowledge, theoretically, the restrictions would be met if the product is used in the conditions described in section 1.1. of this document.

\*\* See Table 2 of Annex I of Regulation (EU) No 10/2011

<b>Dual Use Additives under restriction as listed in Regulations (EC) No 1333/2008<sup>6</sup> and No 1334/2008<sup>7</sup></b>			
<b>Substances</b>	<b>Maximal Residual Level (ppm)</b>	<b>FCM Reference No or CAS RN</b>	<b>Restriction in Food (ppm)</b>
None			

**3. Regulation (EC) No 1935/2004 of the European Parliament & of the Council (Framework Regulation)**

We hereby confirm that the above-mentioned Product, when used in the conditions described in section 1.1 of this document, is expected to meet the relevant requirements laid down in Regulation (EC) No 1935/2004.

Moreover, we inform you that the organoleptic properties are influenced by the conditions of use i.e. temperature, type of packaged foodstuff, storage conditions. Consequently, the packaging must be controlled by the downstream user following the specific end-use conditions of use.

<sup>6</sup> REGULATION (EC) No 1333/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on food additives.

<sup>7</sup> REGULATION (EC) No 1334/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods.

Issued by an electronic system

Zone Industrielle C – B-7181 Seneffe (Feluy)  
Tél. : +32 (0)64 51 41 11 – E-mail : [research-feluy@totalenergies.com](mailto:research-feluy@totalenergies.com)

SA TotalEnergies OneTech Belgium NV  
RPM Charleroi 0438.021.316 T.V.A. BE 0438.021.316 – BNP Paribas Fortis IBAN BE48 2100 4738 2027 BIC GEBABEBB



**TotalEnergies**

**TotalEnergies OneTech Belgium**

Refining & Chemicals / Regulatory Affairs  
[rc.fer-regaffairs@totalenergies.com](mailto:rc.fer-regaffairs@totalenergies.com)

Page 3 of 4

**CERTIFICATE N° 23-ARP-C-0686**

Feluy, October 2, 2023

POLYSTYRENE GPPS 1540 grade as produced in Europe

**4. Commission Regulation (EC) No 2023/2006 (GMP)**

We inform you that the production of the above-mentioned Product is systematically reviewed with regards to good manufacturing practice (GMP) using our ISO 9001 System and following the Plastics Europe guideline specifically dedicated to GMP.

Therefore, we can state that the above-mentioned Product meets the relevant requirements laid down in Commission Regulation (EC) No 2023/2006.

**5. Statement of Transmissible Bovine Spongiform Encephalopathy (BSE)**

Our suppliers provided us with documents addressing potential presence of substances of animal origin. Based on our supplier documentation and/or our own evaluation, we can confirm the following:

1) While Regulation (EC) No 999/2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies (TSE) does not apply to components of packaging materials, we can confirm that none of the components potentially present in the above-mentioned Product qualify as Specified Risk Materials (SRMs) under said Regulation.

2) While Regulation (EC) No 1774/2002 laying down health rules concerning animal byproducts not intended for human consumption does not apply to tallow derivative components themselves, which do not qualify as animal by-products subject to the Regulation, we can confirm that any animal by-product used to manufacture the tallow from which tallow derivative components in the above-mentioned Product are derived are exclusively Category 3 materials processed in compliance with said Regulation.

**6. Business Operator**

TotalEnergies Petrochemicals & Refining (For European countries, except France)  
Boulevard Anspach 1  
1000 Bruxelles  
Belgium

TotalEnergies Petrochemicals France (For France)  
Place Jean Millier 2  
92400 Courbevoie  
France

**7. Business Operator issuing the Statement of Compliance**

TotalEnergies OneTech Belgium  
Zone Industrielle Feluy C  
7181 Seneffe

Issued by an electronic system

Zone Industrielle C – B-7181 Seneffe (Feluy)  
Tél. : +32 (0)64 51 41 11 – E-mail : [research-feluy@totalenergies.com](mailto:research-feluy@totalenergies.com)

SA TotalEnergies OneTech Belgium NV  
RPM Charleroi 0438.021.316 T.V.A. BE 0438.021.316 – BNP Paribas Fortis IBAN BE48 2100 4738 2027 BIC GEBABEBB



**TotalEnergies**

**TotalEnergies OneTech Belgium**

Refining & Chemicals / Regulatory Affairs  
[rc.fer-regaffairs@totalenergies.com](mailto:rc.fer-regaffairs@totalenergies.com)

Page 4 of 4

**CERTIFICATE N° 23-ARP-C-0686**

Feluy, October 2, 2023

POLYSTYRENE GPPS 1540 grade as produced in Europe

Belgium

**DISCLAIMER:**

Our Statement of Compliance is only valid for the above-mentioned Product as far as it was bought from TotalEnergies or its distributor and does not cover:

- Any modification of the above-mentioned Product by any addition of any other product or ingredient to it;
- Any prejudicial modification of the above-mentioned Product resulting from a processing of it;
- An inadequate use and/or storage of the above-mentioned Product and/or of the finished articles.

Unless specifically indicated in a regulatory document, the products mentioned herein are not suitable for applications in the pharmaceutical or medical sector. Under no circumstances any products sold by TotalEnergies Refining & Chemicals are suitable for humans or animals in the following applications: (i) Implantable devices intended for human or animal body (ii) Devices intended to be used in contact with internal body fluids (iii) Devices intended to be used in contact with internal body tissues.

Information contained in this publication is true and accurate at the time of publication and to the best of our knowledge. The nominal values stated herein are obtained using laboratory test specimens. Before using one of the products mentioned herein, customers and other users should take all care in determining the suitability of such product for the intended use.

The Companies within TotalEnergies Refining & Chemicals do not accept any liability whatsoever arising from the use of this information or the use, application or processing of any product described herein. No information contained in this publication can be considered as a suggestion to infringe patents. The Companies disclaim any liability that may be claimed for infringement or alleged infringement of patents.

The present Statement of Compliance is valid for a period of 24 months starting from the date first above written and replaces any earlier Statement relating to this subject which should be considered null and void. Upon the expiration of this Statement, we can issue a new one at your request. In case of change during this period a new Statement will be issued automatically; kindly forward it to any recipient of the present Statement.

TotalEnergies OneTech Belgium, Regulatory Affairs

Issued by an electronic system

Zone Industrielle C – B-7181 Seneffe (Feluy)  
Tél. : +32 (0)64 51 41 11 – E-mail : [research-feluy@totalenergies.com](mailto:research-feluy@totalenergies.com)

SA TotalEnergies OneTech Belgium NV  
RPM Charleroi 0438.021.316 T.V.A. BE 0438.021.316 – BNP Paribas Fortis IBAN BE48 2100 4738 2027 BIC GEBABEBB