

To whom it may concern

Statement concerning

Regulation (EU) No 10/2011 as amended on plastic materials and articles intended to come into contact with food

Kurararay Europe GmbH hereby confirms that KURARAY POVAL™ grades listed in table 1 compositionally meet the relevant requirements laid down in Regulations (EU) No 10/2011 and No 1935 /2004 as amended within the following general framework and limitations:

- All monomers and other starting substances used for the manufacture of KURARAY POVAL™ are authorized for their use in food contact materials by inclusion in Annex I of Regulation (EU) No 10/2011.
- To the monomer vinyl acetate (acetic acid vinyl ester, Ref. No. 10120, FCM No. 231) a specific migration limit (SML) of 12 mg/kg food has been assigned. KURARAY POVAL™ may contain traces of vinyl acetate.
- Methanol is used during the manufacturing processes and will be present in the product as residual solvent in concentrations below 3 wt%. Methanol is an authorized substance within Annex I and, as a volatile solvent, not considered in further detail by Regulation (EU) No 10/2011.
- KURARAY POVAL™ is produced in metal equipment. Therefore, we cannot exclude the presence of metal traces – subject to Annex II – from construction materials. Metal spot checks via ICP/MS revealed concentrations of <10 ppm for barium, copper, cobalt and zinc.
- KURARAY POVAL™ may contain traces of acetaldehyde (Ref.No. 10060, FCM No. 128, group restriction SML of 6 mg/kg food) and crotonaldehyde (CAS No. 4170-30-3) as impurities.
- KURARAY POVAL™ contains up to 1.3% sodium acetate (CAS 127-09-3, E 262) as impurity, which is a dual use additive regarding Regulation (EU) 231/2012 and Regulation (EC) 1333/2008. Because sodium acetate is formed during the manufacturing processes no purity grade is applicable.

KURARAY POVAL™ is regarded as being suited for the use in food contact materials, provided that the finished food contact materials meet the overall migration limit of 60 mg/kg and 10 mg/dm², respectively, as well as substance specific migration limits established by Regulation (EU) No 10/2011.

Above information is intended to support our customers in fulfilling their obligations with regard to Regulation (EU) No 10/2011. The final verification of their product's compliance with migration limits and other applicable requirements of Regulations (EU) No 10/2011 and No 1935/2004 is in the responsibility of the manufacturers of the finished products and can only be performed by them.

Table 1 (For grades with country of origin Germany)

Partially hydrolyzed KURARAY POVAL™ grades			Fully hydrolyzed KURARAY POVAL™ grades	
3-83	4-88	30-92	2-98	15-99
3-85	4-88 S2	50-92	3-98	28-99
3-85 S4	6-88	23-88	4-98	
4-85	8-88	40-88	6-98	
	8-88 S2	44-88	10-98	
	13-88	47-88	20-98	
	18-88	47-88 S2	30-98	
	18-88 S2	22-88	56-98	
	23-88 S2	22-88 S2		
	26-88	49-88		
	32-88	49-88 S2		
	56-88	6-96		

LA grades are as same as standard grades

Some grades are also produced in USA, Singapore and Japan: For regulatory food contact compliance information for these countries please send requests to your KURARAY contact.

With our best regards,

Kuraray Europe GmbH



i. V. Dr A. Laqua

(Product Stewardship & REACH)

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