

Declaration of Compliance according to Regulation (EU) No. 10/2011 Annex IV and Article 15
on plastic materials and articles intended to come into contact with food.

Issued by: BWF Tec GmbH & Co. KG
Bahnhofstraße 20
89362 Offingen
Germany

Issued on: 1st January 2026

Valid: This declaration of conformity is valid from the date of issue and remains valid as long as no relevant changes occur.

For the following products: needlona® polyester needle felts "FoodTec®" with specific weights of 250 to 600 g/m² without laminated membrane. The needle felts can be conductive (ExCharge®), pleatable (ComPleat®) and / or feature fine fibers (MPS®). The product is an intermediate which will be finished by a further manufacturer to filter elements as pockets or bags.

Manufactured by: BWF Tec GmbH & Co. KG
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89362 Offingen
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Confirmation: The polyester needle felts are in accordance with the following legal requirements: (including all regulation amendments and in the version valid at the time of issuance of this declaration)

- Regulation (EC) No. 1935/2004 (Framework Regulation)
- Regulation (EU) No. 10/2011 (Plastics Regulation), including Amendment Regulation (EU) No. 2025/351
- German Food and Feed Code (LFGB)
- German Consumer Goods Ordinance (Bedarfsgegenständeverordnung)
- Regulation (EC) No. 2023/2006 (GMP Regulation)
- Regulation (EU) No. 2025/40, in particular Recitals (25) to (27), successor to Directive 94/62/EC, Article 11(1) (Heavy Metals)

The conformity of the material was determined on the basis of information obtained from the supply chain and, additionally, by means of migration testing on the finished product, polyester needle felt (areal weights 550 and 600 g/m²), in accordance with Regulation (EU) No 10/2011.

The substances used comply with the requirements for a high degree of purity in accordance with Regulation (EU) No 10/2011 as amended by Regulation (EU) 2025/351.

List of substances:

List of substances named by the supplier or their degradation products for which Annexes I and II of Regulation (EU) No 10/2011 contain restrictions and/or specifications.

| Substance | Source of information (EU) 10/2011 | FCM-Substance-No. | SML resp. SML (T) |
|------------------|---|--------------------------|--|
| ethylenglycol | Annex I Tab. 1 and 2 | 227 | 30 mg/kg expressed as ethyleneglycol |



At our German site, we are registered under the EMAS Regulation (EC) No 1221/2009 and certified under the ISO 9001 quality management system. At our Chinese site, we are certified under the ISO 9001 quality management system, the ISO 14001 environmental management system and under the ISO 45001 occupational health and safety management system.

| | | | |
|-------------------------|--------------------------|-----|--|
| diethylenglycol | Annex I Tab. 1 and 2 | 263 | 30 mg/kg expressed as ethyleneglycol |
| terephthalic acid | Annex I Tab. 1 and 2 | 785 | 7.5 mg/kg expressed as terephthalic acid |
| antimony (Sb) | Annex I and II Tab. 1 | 398 | 0.04 mg/kg |
| Trimethylol- propane | Annex I Tab. 1 | 141 | 6 mg/kg |
| Isophthalic acid | Annex I Tab. 1 and 2 | 291 | 5 mg/kg expressed as Isophthalic acid |

Further Ingredients : (Dual-Use-Additives)

The substances listed below are classified as dual-use additives according to the available supplier information. They are listed in Annex I of Regulation (EU) No 10/2011 and are taken into account as part of the safety assessment. No specific migration limits (SML) apply to these substances; they are subject exclusively to the overall migration limit (OML).

| Substance | Source of information (EU) 10/2011 | FCM-Substance-No. | Ref. No |
|----------------------|---|--------------------------|----------------|
| Orthophosphoric acid | Annex I Tab. 1 and 2 | 509 | 23170 |

Primary aromatic amines : (PAA)

No PAA are used in the manufacture of the above-mentioned products. To the best of our knowledge and based on the supplier information available to us, no primary aromatic amines (PAA) are used.

Conformity with restrictions set out in the list of substances:

The specific limits of migration are respected under the following test conditions (per 6 dm² needle felt per kg food):

The substances listed above were not detected during the migration testing carried out in accordance with Regulation (EU) No 10/2011. Furthermore, no migration-relevant substances with specific migration limits were detected above the limit of detection.

Conformity with the overall migration limit:

In accordance with Regulation (EU) No 10/2011, Annex III, no gravimetric testing of overall migration (OML) is required for the intended use (contact with dry foods), as no food simulant is specified for this food category for the determination of the OML.

The overall migration was determined voluntarily and additionally on a semi-quantitative basis in order to allow a conservative assessment under maximum conditions (6 dm² of needle felt per 1 kg of food).

The semi-quantitative overall migration is below 0.6 mg/dm² and thus well below the reference value of the overall migration limit (OML) of 10 mg/dm²

| Test simulant | Test conditions | Semi-quantitative overall migration test value | Reference value (OML) |
|----------------------|---------------------------------|---|------------------------------|
| E | 10 days, 40 °C + 6 h, 100 °C | < 0.6 mg/dm ² | 10 mg/dm ² |



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Explanatory note: Due to the diverse fields of application a worst case scenario was chosen for the test conditions.

Note on NIAS :

Non-intentionally added substances (NIAS) were assessed as part of the migration testing carried out in accordance with Article 19 of Regulation (EU) No 10/2011. Based on this assessment, no additional information is required for this declaration of conformity.

Heavy metals :

| Substance | Test conditions | Results | SML / SML (T) |
|---------------|---|-------------------|---------------|
| antimony (Sb) | 6 h, 100 °C, food simulant E ICP-MS | < 0,0018 mg/kg | 0,04 mg/kg |

Test method ICP/MS
and Photometry
(DIN EN ISO 17294-2,
18412:2006)

The requirements of Regulation (EU) No. 2025/40, in particular the restrictions set out in Recitals (25) to (27) regarding heavy metals, are observed. The concentrations of heavy metals such as cadmium (Cd), chromium (CrVI), mercury (Hg) and lead (Pb) are below the respective limits of determination. The sum of all concentrations is below the total limit specified in Regulation (EU) No. 2025/40.

Specifications on the use of the material or article

types of food with which it is intended to be put into contact:

Dry food in powder form

time and temperature-of treatment and storage in contact with the food:

The polyester needle felts are used in the food production as filter media for the removal of dust. The precise time and the maximum temperature to be reached may differ case by case. A prolonged contact time as usual in the storage or packaging of food is not foreseen.

ratio of food contact surface area to volume used to establish the conformity of the material of article:

6 dm²/kg in accordance with Article 17(2) of Regulation (EU) No 10/2011

Multi-layer / Barrier:

The filter medium contains no functional barrier.

Important remarks:

The BWF Tec GmbH & Co. KG has no impact on further manufacturing and finishing of the polyester needle felts. The subsequent manufacturer/supplier is responsible in person for testing and declaring the conformity of the finished product.



Nikolai Beranek
Managing Director



Narcis Beganovic
Quality Manager



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