

## DECLARATION OF COMPLIANCE

### PRODUCTS

Code	Body type	Body Colour	Ink type	Ink Colour	Pocket clip	Lanyard loop	Quantity
RG-RSC	Retractable	Blue	Regular	BK, BL, RD, GN	Yes	Yes	25
RG-RSC3	Retractable	Red	Regular	BK, BL, RD, GN	Yes	Yes	25
RG-RSC4	Retractable	Yellow	Regular	BK, BL, RD, GN	Yes	Yes	25
RG-RSC5	Retractable	Green	Regular	BK, BL, RD, GN	Yes	Yes	25
RG-RSL	Retractable	Blue	Regular	BK, BL, RD, GN	No	Yes	25
RG-RGC	Retractable	Blue	Gel	BK, BL	Yes	Yes	25
RG-RPC	Retractable	Blue	Pressurised	BK, BL	Yes	Yes	25
RG-NSL	Fixed stick	Blue	Regular	BK, BL	No	Yes	50
RG-NSC	Fixed stick	Blue	Regular	BK, BL	Yes	Yes	50
RG-PXM	Marker	Blue	Permanent marker	BK, BL, RD, GN	n/a	n/a	10
RG-WBM	Marker	Blue	Dry wipe marker	BK, BL, RD, GN	n/a	n/a	10
RG-HLM	Marker	Blue	Highlighter	BL, YL, GN, OR, PU	n/a	n/a	10

The bodies of the Retreeva Global detectable pen range are manufactured using polymers certified to be in compliance with:

- ▶ EU Regulation 1935/2004 Materials and articles in contact with food.
- ▶ EU Regulation 10/2011 and amendment 202/2014 plastic materials and articles intended to come into contact with food.
- ▶ In addition, the Metal and -ray detectability report dated 6th March 2014.

Code	Description	Comments
RG-RSC	Retractable pen w/ lanyard loop & pocket clip, blue housing, regular ink.	Ink options; blue, black, red, green.
RG-RSC3	Retractable pen w/ lanyard loop & pocket clip, red housing, regular ink.	Ink options; blue, black, red, green.
RG-RSC4	Retractable pen w/ lanyard loop & pocket clip, yellow housing, regular ink.	Ink options; blue, black, red, green.
RG-RSC5	Retractable pen w/ lanyard loop & pocket clip, green housing, regular ink.	Ink options; blue, black, red, green.
RG-RSL	Retractable pen w/ lanyard loop only, blue housing, regular ink.	Ink options; blue, black, red, green.
RG-RGC	Retractable pen w/ lanyard loop & pocket clip, blue housing, gel ink.	Ink options; blue, black.
RG-RPC	Retractable pen w/ lanyard loop & pocket clip, blue housing, pressurised ink.	Ink options; blue, black.
RG-NSC	Non-retractable stick pen w/ pocket clip and lanyard loop, blue housing, regular ink.	Ink options; blue, black.
RG-NSL	Non-retractable stick pen w/ lanyard loop only, blue housing, regular ink.	Ink options; blue, black.
RG-PXM	Permanent marker	Ink options; blue, black, red, green.
RG-WBM	White board/ Dry wipe marker	Ink options; blue, black, red, green.
RG-HLM	Flourescent highlighter marker	Ink options; blue, yellow, green, orange, pink.

Date of issue	27-04-2018	Revision No.	003	Revised by	GB
Authorised by	S. Britton	Document No.	DOC-R002	Page	1 of 4

## FOOD CONTACT STATUS

Herewith we declare that the raw materials used in the manufacturing process of the above mentioned Retreeva global metal detectable pens (Witcom PP-2011/143 Blue) can be considered suitable for food contact applications in terms of compliance with European and/or USA (FDA) regulations.

**EU:** Hereby we declare that the material Witcom PP-2011/143 blue is manufactured in line with the relevant requirements of 2023/2006/EC on good manufacturing practice for materials and articles intended to come into contact with food. Furthermore, we declare compliance with REACH SVHC (latest update December 19, 2011); with the Framework Regulation 1935/2004/EC, with the consolidated Commission Regulation No.10/2011 (amendment 202/2014) on plastic materials and articles intended to come into contact with food; the pigments used are compliant with EN-71-3 (Toys) and European Council Resolution AP(89) 1.

Applicable restrictions on monomers, additives etc. (SML, QM) are available on request. The finished articles are required to meet the Overall Migration Limit (OML) of 10 mg/dm(sq) or 60 mg/kg food.

**USA:** The polypropylene resin used meets the FDA (Food and Drug Administration) requirements contained in the Code of Federal Regulations in 21 CFR 177.1520 (a) (3) (i) , (b) and (c) (3.1a). At the same time this grade meets the FDA criteria in 21 CFR 177.1520 for food contact applications listed under conditions of use A through H in 21 CFR 176.170 (c), Table 2., and can be used in contact with all food types as listed in 21 CFR 176.170 (c), Table 1. Also the mineral additives are GRAS (Generally Recognized as Safe) or are FDA cleared under specific FDA citations.

**Note:** This does not imply that such a declaration about the raw materials used is enough for legal compliance; migration studies are mandatory to prove suitability of the compounded materials. The responsibility for the use of the final products/articles (with respect to medical or food contact regulations) rests entirely at the end-use manufacturer. He should ensure that his products comply with the migration and concentration requirements imposed and that it is produced under the right circumstances. The ink contained within the products listed are by their very nature not suitable for contact or indirect contact with food and as such we have not designed this product to be contact with food when used normally.

## METAL DETECTION SUITABILITY TESTING

Date: 06-03-2014  
 Location: Hertogenbosch (NL)  
 Company: Mettler-Toledo Product Inspection B.V.

To test detectability of Retreeva Global against a competitor's equivalent. We have two pens to test, a Retreeva Global pen made from Witcom material and a pen from a competitor's material. To test the detectability, we used the sample lines at Mettler Toledo.

Detector: Safeline X33 series machine  
 Speed: 30 m/min  
 Sensibility: > ø 1.2mm Fe/N-Fe/RVS  
 Settings: Product with relative much contrast, like chocolate biscuits.  
 Products with less contrast, like rice.

### Metal detection line

Detector: Safeline Profile 450x175 SS 300 Khz  
 Speed: 30 m/min  
 Sensibility: > ø 1,2mm Fe, > ø .5mm en > ø 1.8mmN-Fe/RVS  
 Settings: "wet" products, like cheese or meat.  
 "dry" products, like rice or biscuits.

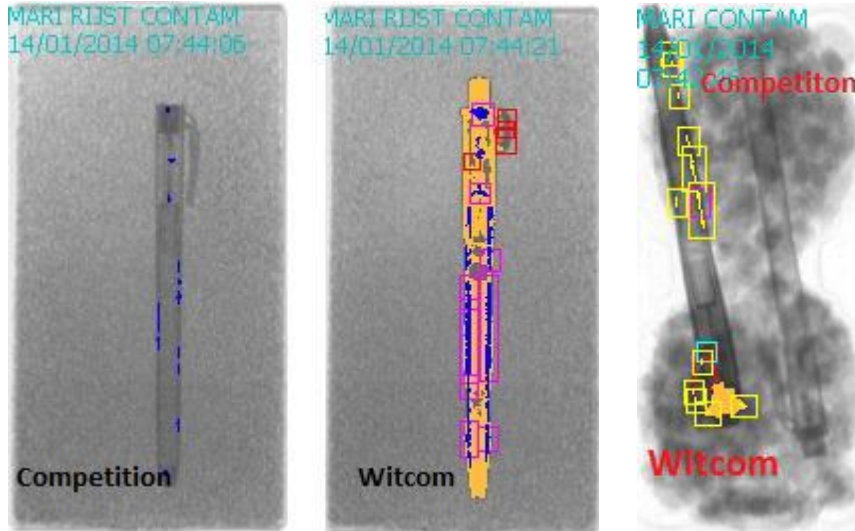


Date of issue	27-04-2018	Revision No.	003	Revised by	GB
Authorised by	S. Britton	Document No.	DOC-R002	Page	2 of 4

## X-RAY DETECTION

The X-ray testing was done with the whole pen. We tried to detect the pen on a package of rice and on a package of chocolate biscuits. Below there are some pictures from the X-ray scan. On the left side there are two packages of rice, each with a pen on top of it, and on the right side a package of biscuits with both pens on top of it.

As you can see the, Retreeva Global (Witcom) pen is highly detectable, hence the blue and yellow areas. The pen made in the competitor's material is hardly detectable. There are some small blue marks when on top of the package of rice, but there is no detection at all when lying on a package of biscuits.



**Figure 1. X-ray detection on package of rice and two pens on a package of biscuits.**

## METAL DETECTION

The tests on metal detectability were done on the whole pens, but also on smaller parts. We took the lower part of the pencil (the part you hold when you write with the pen), and we took the clip which is the most fragile part of the pencils. We made these parts the same size, so the results are comparable. Besides, metal detection can be influenced with the “direction” of the particle. Therefore, we tested the pen pieces horizontally, vertically and diagonally (X, Y, Z-directions). There were no differences found in level of detectability. All particles tested were detectable in all 3 directions. There was only a difference when we changed the setting to wet products, then the detection level was a little bit lower, but still good enough to eject the products.

## CONCLUSION

The table shows all the results for the detectability testing.

	Retreeva Global	Competition
X-Ray (much contrast)	Very good detectability	No detection
X-Ray (less contrast)	Very good detectability	No detection
Metal detection (Dry product)	Very good detectability	Very good detectability
Metal detection (Wet product)	Good detectability	Good detectability

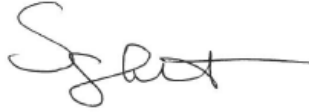
Both materials exhibit good metal detectability with comparable results. The Retreeva global pen made from the Retreeva Global material is also detectable with an X-ray scanner where the competitors pen was not.

Date of issue	27-04-2018	Revision No.	003	Revised by	GB
Authorised by	S. Britton	Document No.	DOC-R002	Page	3 of 4

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Date of issue	27-04-2018	Revision No.	003	Revised by	GB
Authorised by	S. Britton	Document No.	DOC-R002	Page	4 of 4