

Declaration of Compliance

EU Declaration of Compliance, Annex IV, Regulation (EU) 10/2011

1. Identity and address of the operator issuing the DoC:

The Hill Brush Company Ltd
Norwood Park
Mere
Wiltshire
BA12 6FE

2. Identity of the business operator which manufactures or imports the product:

The Hill Brush Company Ltd
Norwood Park
Mere
Wiltshire
BA12 6FE

3. Identity of the material: **Products with TPE rubber.**

4. Date of the declaration: February 13, 2023

5. Confirmation that the product meets the legal requirements:

Our customers and authorities require documentation that demonstrates that the products supplied Hillbrush comply with all regulations regarding contact with food in areas of food safety such as EU Commission Regulation no. 1935/2004 article 3, 11(5), 15 and 17. In complying with all relevant regulations, products manufactured by Hillbrush can carry the “glass & fork” symbol either on the products or their packaging.



Regulation (EC) No. 1935/2004 of the European Parliament and of the Council on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (Text with EEA relevance);

Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food (Text with EEA relevance), meeting the requirements. Subsequent amendments up to (EU) 2020/1245 are included.

Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food (GMP) as amended (Text with EEA relevance);

The NIAS (Non Intentionally Added Substances) and the identified IAS (Intentionally Added Substances) present in this product have been risk assessed in accordance with Art 19 of the Plastics Regulation (10/2011) and comply with the relevant requirements of the Framework Regulation (1935/2004).

Regulation (EC) No. 1895/2005 of November 2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food (Text with EEA relevance);

Regulation (EC) No 450/2009 of 29 May 2009 on active and intelligent materials and articles intended to come into contact with food (Text with EEA relevance);

Commission Regulation (EU) 2016/1416 of 24 August 2016 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food (Text with EEA relevance).

The Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019 – 2019 No. 704

UK HEADQUARTERS

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USA

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6. Adequate information on the substances used for which restrictions are set out:

Monomers and intentionally added additives used to manufacture this product are listed in Annex I of Commission Regulation (EU) No. 10/2011 of 14. January 2011 on plastic materials and articles intended to come into contact with foodstuffs. Subsequent amendments up to (EU) 2020/1245 are included.

Monomers and/or additives with specific migration limit (SML) are used. The substances with a SML will not migrate in quantities that will exceed the SML, under the specified conditions of use. Upon request we will supply relevant information regarding these substances on a confidential basis.

The master batch is in compliance with European Resolution Res AP (89) 1.

7. Adequate information relative to the substances which are subject to a restriction in food:

This material contains one or more intentionally added dual use additives which are subject to disclosure of adequate information as described in 2007/19/EC. The identity of this/these substance(s) can be disclosed for testing purposes upon request and with confidential conditions.

Samples of product, or a similar sample made from identical plastic material have been tested using a program devised in accordance with the BS EN ISO 1186 series of standards and Commission Regulation No. 10/2011 as amended.

Test conditions for overall migration were 10 days contact time at 40 °C, complying with overall migration limit of 10mg/dm² or adjusted for 6.0dm²/kg for specific migration. Simulants used include: 10% (v/v) Ethanol in Aqueous Solution (simulant A), 3% (w/v) Acetic acid in Aqueous solution (simulant B), 95% (v/v) Ethanol and Iso-Octane (equivalent to Vegetable oil for 10 days at 40°C simulant D2).

Compliance with specific migration limits, and other restrictions, has been documented through testing, calculation or simulation.

8. Specifications on the use of the material or article:

This product is suitable for use with the following foodstuffs:

- Aqueous foods
- Acidic
- Alcoholic
- Dry

9. When a functional barrier is used, confirmation that the article complies with this legislation:

This product does not make use of multi-layer materials or articles with a functional barrier.

All hygienic products manufactured by Hillbrush comply with FDA regulations:



FDA (Food and Drug Administration in the USA)

All Hillbrush hygienic products are manufactured using materials listed under following Code of Federal Regulations Title 21:

21 CFR 177.1520 – Olefins Polymers intended for single or repeated use with food contact surfaces

21 CFR 176.170 – Components of paper and paperboard in contact with aqueous and fatty foods

21 CFR 177.1660 – Polymers intended for single or repeated use with food contact surfaces

21 CFR 177.1500 – Nylon Resins intended for single or repeated use with food contact surfaces

21 CFR 178.3297 – Colour Masterbatch in Polymers intended for single or repeated use with food contact surfaces

Hillbrush also operates under the following recognized agencies and organizations:



FEIBP (European Brush ware Federation) (PHB Hygiene Charter GB – 700)

Hillbrush products also comply with the requirements laid out in the European Brush Manufacturer's Professional Hygiene Brush Charter, which promotes high quality professional brushware, and confirms that the products comply with all existing Hygiene Regulations. Registration Number GB -700.

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ISO9001:2015

Hillbrush operates a Quality Management System and has been assessed and approved under the ISO9001:2015 standard.

Chemical Resistance - Concerning the chemical resistance of the plastics used in Hillbrush products, we confirm that the products resist all approved detergents and sanitizers according to the dosing and temperature recommendations from the detergent manufacturer. Please see our Chemical Resistance Chart online.

Temperature Ranges: All Hillbrush hygienic products can be stored and used indefinitely at normal room temperatures. Advised maximum and minimum temperatures are -18°C to 79°C, but it should be noted that prolonged exposure to extremes of temperature can affect the molecular structure of Polypropylene – extended storage at -18°C can cause Polypropylene to become brittle. All Hillbrush hygienic products can be autoclaved up to 134°C.

Autoclaving: Tests were carried out on Hillbrush hygienic products using an Eschmann SES2000 Autoclave. The temperature setting was 134°C/275°F for 18 minutes plus a drying cycle.

All Hillbrush hygienic products are made using the same grades of Polypropylene, Polyester monofilament and TPE rubber across the various ranges of hygienic products manufactured by Hillbrush. Therefore, this Declaration of Compliance covers all the Hillbrush hygienic products.

Hillbrush products are made to the highest standard and are designed to be robust and long lasting. However, they still need to be suitably maintained and cleaned for them to perform at that high-quality level. It is recommended that Hillbrush hygienic products be cleaned, disinfected and sterilized before and after each use. Proper equipment decontamination will minimize the risk of microbial growth and the risk of possible cross contamination. A proper cleaning, sterilization regime will maintain the products suitability to do the job for which it is intended, proper cleaning will also ensure the durability of the product.

Hillbrush maintain the suitable documentation from its trusted suppliers detailing the component parts quality and suitability for use in food contact areas. This documentation is available upon request.

Phil Norris
Product and Quality Assurance Manager



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