



## PACKAGING COMPLIANCE TO EU, US & CHINESE REGULATIONS

Zespri International Limited (Zespri) confirms to the best of its knowledge and belief that all Transport Packaging used for the purpose of packing and labelling Zespri branded kiwifruit meets EU, US and Chinese packaging regulations for either direct or indirect food contact dependent on the packaging component in question.

Zespri approves all suppliers of packaging componentry for kiwifruit supplied to Zespri. Approved suppliers are required to supply Zespri annually with a material specification for the packaging component supplied. During the annual supplier registration process proof of compliance to all relevant food contact compliance regulations is collated and filed.

### **DIRECT FOOD CONTACT**

Manufacturers are required to annually supply Zespri with a material specification stating that the material used in the production of componentry/labels are approved for direct food contact in the EU, US and China.

No intentionally added PFAS is allowed in any Zespri packaging. Zespri's limit for organic fluorine is below 100ppm or preferably below 40ppm.

### **Pocket Packs, Polybags & Polyliners (made from virgin PET, PP and PE)**

- Regulation (EC) No 1935/2004 Materials and articles intended to come in contact with food
- Regulation (EU) No 2023/2006 Good manufacturing practice for materials and articles intended to come into contact with food
- Regulation (EU) No 10/2011 (including amendments up to (EU) No 2024/3190) Plastic materials and articles intended to come into contact with food
- US FDA Title 21 CFR 174.5 General provisions applicable to indirect food additives (including GMP requirements)
- US FDA Title 21 CFR 177.1630 Polyethylene phthalate polymers (for PET)
- US FDA Title 21 CFR 177.1520 Olefin polymers (for PE and PP)
- US FDA Title 21 CFR 178.2010 Antioxidants and/or stabilizers for polymers (if applicable)
- GB 31603–2015 General hygienic norms for manufacture of food contact materials and articles
- GB 4806.1-2016 General safety requirements on food contact materials and articles
- GB 9685-2016 Use of additives in food contact materials and articles
- GB 4806.7-2023 Plastic materials and products for food contact

### **Corrugated Paperboard Packaging (made from virgin fibre and including starch-based adhesive and printing ink)**

- Regulation (EC) No 1935/2004 Materials and articles intended to come in contact with food
- Regulation (EU) No 2023/2006 Good manufacturing practice for materials and articles intended to come into contact with food
- Applicable national legislations for food contact paper and board (e.g. German BfR Recommendation XXXVI Paper and board for food contact, etc.)
- Swiss Ordinance No 817.023.21 Food contact materials and articles , Annex 10 Edition 3.3 (only applicable if FCM is printed)
- French Decree No. 2020-105 Fight against waste and the circular economy'
- French Law No. 2012-1442 of December 24, 2012 Banning the use of BPA in food packaging
- US FDA Title 21 CFR 174.5 General provisions applicable to indirect food additives
- US FDA Title 21 CFR 186.1673 Pulp
- US FDA Title 21 CFR 176.170 Paper and board components in contact with aqueous and fatty food
- US FDA Title 21 CFR 175.105 Adhesives (only applicable if FCM is glued)
- GB 31603–2015 General hygienic norms for manufacture of food contact materials and articles (GMP requirements)
- GB 4806.1-2016 General safety requirements on food contact materials and articles
- GB 9685-2016 Use of additives in food contact materials and articles
- GB 4806.8-2022 Food contact paper and paperboard materials and their products
- GB 4806.14-2024 Inks for food contact materials and products (only applicable if FCM is printed)
- GB 4806.15-2024 Adhesives for food contact materials and products (only applicable if FCM is glued)

## **Biobased Plastic Fruit Labels (including adhesive and ink)**

Food safety requirements: as listed above (where relevant) and additional regulations below (where relevant)

- Regulation (EC) No 1935/2004 on materials and articles intended to come in contact with food
- Regulation (EU) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- Regulation (EU) No 10/2011 (including amendments up to (EU) No 2024/3190) on plastic materials and articles intended to come into contact with food
- Swiss Printing Ink Ordinance No 817.023.21 Food contact materials and articles , Annex 10 Edition 3.3 (only applicable if FCM is printed)
- US FDA Title 21 CFR 174.5 General provisions applicable to indirect food additives
- US FDA Food Contact Substance Notification (FCN) (requirement to clear the biopolymer face film)
- US FDA Title 21 CFR 178.2010 Antioxidants and/or stabilizers for polymers
- US FDA Title 21 CFR 175.125(b) Adhesives and components of coatings
- US FDA Title 21 CFR 178.3297 Colorants for polymers
- GB 31603–2015 General hygienic norms for manufacture of food contact materials and articles (GMP requirements)
- GB 4806.1-2016 General safety requirements on food contact materials and articles
- GB 9685-2016 Use of additives in food contact materials and articles
- GB 4806.7-2023 Plastic materials and products for food contact
- GB 4806.14-2024 Inks for food contact materials and products
- GB 4806.15-2024 Adhesives for food contact materials and products

Other requirements:

- Regulation EC No. 907/2004 amending the marketing standards applicable for fresh fruit and vegetables with regards to presentation and labelling: “Stickers individually affixed to produce shall be such as when removed, neither to leave visible traces of glue, nor lead to skin defects.”
- Fruit Labels will have no intentionally added PFAS. Zespri limit for organic fluorine of 100ppm and a preferred level of < 40ppm

## **INDIRECT FOOD CONTACT**

All components used comply with relevant international food safety regulations for indirect food contact. All cardboard cornerboards are 100% recyclable and printed with an internationally recognisable recycling logo such as RESY or InterSeroh Registration. Cornerboards do not contain any bitumen or other prohibited materials.



## **WOODEN PALLETS**

Wooden pallets meet the requirements of the International Plant Protection Convention (IPPC) and are certified and marked with the IPPC symbol by an accredited supplier.

In making these representations, Zespri is relying on the information and assurances provided by its packaging suppliers. While Zespri takes reasonable steps to determine the accuracy and truth of the statements made, it makes no warranty, representation or guarantee of the accuracy or completeness of the information and assurances provided. Zespri accepts no liability to any person for any loss, damage or injury arising from that person’s reliance on this information.