

DECLARATION OF COMPLIANCE

Retreeva Global Pens

Products

Detectable pens with no springs.

Code	Body type	Body Colour	Ink type	Ink Colour	Pocket clip	Lanyard loop	Quantity
P8900	Fixed stick	Blue	Std	BK, BL	No	Yes	50
P8901	Fixed stick	Blue	Std	BK, BL	Yes	Yes	50
P8902	Retractable	Blue	Std	BK, BL, RD, GN	Yes	Yes	25
P8902GN	Retractable	Green	Std	BK, BL, RD, GN	Yes	Yes	25
P8902RD	Retractable	Red	Std	BK, BL, RD, GN	Yes	Yes	25
P8902YL	Retractable	Yellow	Std	BK, BL, RD, GN	Yes	Yes	25
P8903	Retractable	Blue	Std	BK, BL, RD, GN	No	Yes	25
P8906	Marker	Blue	Marker	BK, BL, RD, GN	NA	NA	10
P8910	Marker	Blue	Dry wipe	BK, BL, RD, GN	NA	NA	10
P8935	Retractable	Blue	Gel	BK, BL	Yes	Yes	25
P8938	Retractable	Blue	Pressurised	BK, BL	Yes	Yes	25

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

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

Products:

Retractable pen with lanyard loop and pocket clip [no spring] (in red, blue, black and green inks): P8902

Retractable pen with lanyard loop only [no spring] (in standard regular ink blue, Red & black): P8903

Retractable pen with lanyard loop and pocket clip Gel ink [no spring] (in blue & black inks): P8935

Retractable pen with lanyard loop and pocket clip pressurised ink [no spring] (in blue & black inks): P8938

Non- Retractable “stick” pen with lanyard loop and pocket clip (in blue & black inks): P8901

Non- Retractable “stick” pen with lanyard loop only (in blue & black inks): P8900

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Food Contact Status

Herewith we declare that the raw materials RG PP 11/143 used in the manufacturing process of the above mentioned Retreeva global metal detectable pens 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 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 : 's-Hertogenbosch (NL)
 Company : Mettler-Toledo Product Inspection B.V.

To test detectability of Retreeva Global against a competitors equivalent. We have two pens to test, a Retreeva Global pen made from RG PP 11/143 material and a pen from a competitor's material. To test the detectability, we used the sample lines at Mettler Toledo.

X-ray detection line

Detector : Safeline X33 serie 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 > ø1.8mmN-Fe/RVS
 Settings : - "wet" products, like cheese or meat.
 - "dry" products, like rice or biscuits.



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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 pen (RG PP 11/143) 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.

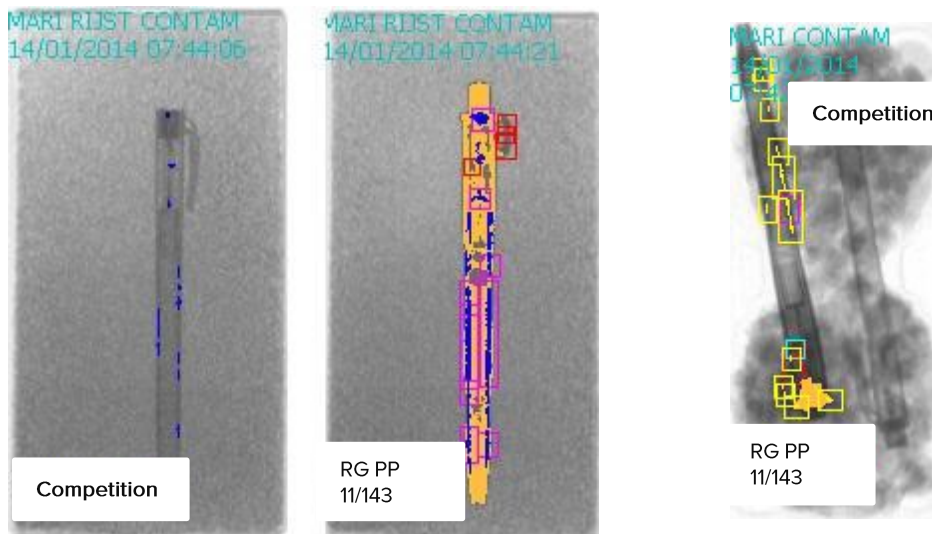


Figure 1. X-ray detection on package of rice and two pens on a package of biscuits.

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

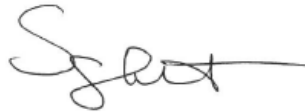
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Both materials exhibit good metal detectability with comparable results. The Retreeva global pen made from RG PP 11/143 is also detectable with an X-ray scanner where the competitors pen was not.

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29-11-18

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