solution in spirals
Württembergische
Spiralsiebfabrik GmbH

Declaration of Compliance

for spiral fabric grades made of polyethylene terephthalate (PET)
intended for use as food contact materials

1. Manufacturer's Declaration

Württembergische Spiralsiebfabrik GmbH, 73061 Ebersbach, 1. hereby declares that the products described below:

Spiral Fabrics of L-Quality

are suitable for contact with food and comply with the applicable legal requirements.

2. Applicable Regulations

The products comply with the requirements of the following regulations:

- Regulation (EC) No. 1935/2004 (Articles 3, 11, 15 and 17)
- Regulation (EU) No. 10/2011 (Chapters II, III and V, including amendments up to (EU) 2023/1442)
- Regulation (EC) No. 2023/2006 (Good Manufacturing Practice)
- German Food and Feed Code (LFGB), Sections 30 and 31

3. Material Description

The spiral fabrics consist of:

- PET monofilaments (white, green, blue)
- Polyurethane (PUR) edge reinforcement

Declarations of compliance from upstream suppliers are available for all materials used.

4. Designation of Spiral Fabric Types

Spiral fabrics intended for food contact are identified in the product type designation by the letter "L," which follows the numerical combination of the spiral fabric type.

Examples of products for food industry applications: 38000 FL blue, 43000 FL blue, 60000 L, 70000 L green, 90000 L, 100000 L blue

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Hans-Zinser.Str.1
D 73061 Ebersbach
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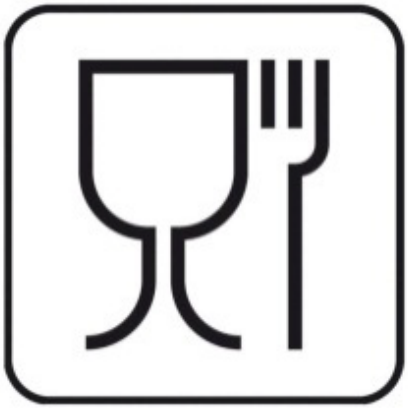
Packaging for spiral fabrics intended for food contact is marked with the following symbol as a sticker, stamp, or similar:



EG Verordnung 10/2011

5. FDA Compliance

The PET materials used comply with the requirements of 21 CFR § 177.1630.

The polyurethane components used for the edge reinforcement comply—based on composition, raw material evaluation, and supplier declarations—with the relevant requirements of applicable sections of 21 CFR. Assignment to specific paragraphs is made where technically and regulatorily appropriate.

Compliance with applicable extraction requirements has been evaluated.

6. Bisphenol A (BPA)

The products comply with the requirements of Regulation (EU) 2024/3190.

Bisphenol A (BPA) and structurally related bisphenols are not intentionally used in the manufacturing process and, to the best of current knowledge, are not present above analytical detection limits in the material. Compliance has been ensured based on supplier declarations, raw material specifications, and internal assessments.

7. Migration

7.1 Overall Migration (OML)

Overall migration was determined in accordance with Regulation (EU) No. 10/2011 using appropriate food simulants and test conditions.

Result:
The total migration is below the limit of 10 mg/dm².

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7.2 Specific Migration (SML)

Specific migration of relevant substances was analytically tested.

Result:
All tested substances are below the applicable specific migration limits (SML) according to Annex I of Regulation (EU) No. 10/2011.

8. Relevant Substances with Restrictions (Customer-Specific Overview)

The following table contains a reduced selection of relevant substances with specific migration limits (SML) according to Annex I of Regulation (EU) No. 10/2011. The selection is based on raw materials used and known potential migrants.

According to the information provided by our suppliers, the following ingredients may be present subject to the restrictions set forth in Annex I and Annex II.

Substance.	FCM-No.	SML
Polyethylene glycol (EO=1-50); (C8-22)	799	SML(T) = 1,8 mg/kg
Ethylene glycol	227	SML(T) = 30 mg/kg
Isophthalic acid	291	SML(T) = 5 mg/kg
Terephthalic acid	785	SML(T) = 7,5 mg/kg
1,4-Butandiol	254	SML = 5 mg/kg
Tetrahydrofuran	246	SML = 0,6 mg/kg
Acetaldehyde	128	SML = 6 mg/kg
Dimethyl terephthalate	288	SML = 1 mg/kg
Copper	98	SML(T) = 5 mg/kg
Aluminum	21	SML = 1 mg/kg

Assessment:
The specific migration of these substances is below the respective limits.

9. Dual-Use Additives (Selection)

L - PET spiral fabrics may contain the following dual-use additives, which are authorized both as food additives under Regulation (EC) No. 1333/2008 and as flavorings under Regulation (EC) No. 1334/2008:

Substance	E-No.	FCM-No.
Polydimethylsiloxane	E 900	575
Montanic acid and ester	E 912	67
Silicium dioxide	E 551	504

10. NIAS (Non-Intentionally Added Substances)

Non-intentionally added substances (NIAS) were identified using screening methods.

The assessment was carried out in accordance with Article 19 of Regulation (EU) No. 10/2011. The identified substances were toxicologically evaluated using a conservative exposure assessment and classified as safe.

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11. Conditions of use

The products are suitable for contact with food corresponding to the tested simulants (A, B, and D2). Suitability applies to food types represented by these simulants.

Maximum conditions of use:

- Temperature: up to 100 °C
- Contact time: up to 2 hours

The performed tests represent worst-case conditions.

12. Surface to volume ratio

The ratio of contact surface area to food volume is:

6 dm²/kg (standard assumption according to EU requirements). Deviations may occur in practical applications and must be considered by the user.

13. Functional Barrier

The products do not contain a functional barrier. Such a barrier is not required due to the homogeneous material structure.

14. Traceability and GMP

Manufacturing is carried out in accordance with Regulation (EC) No. 2023/2006.
All materials used and production processes are documented and traceable.

15. Limitations and Responsibility of the User

The suitability for a specific application must be verified by the user, taking into account actual conditions of use.

16. Supporting Documentation

Detailed test results, complete substance lists, and analytical data (including NIAS screening) are part of the technical documentation and can be provided upon request.

17. Validity

This declaration of compliance applies to all spiral fabrics of L-quality as specified by the marking.

It is based on available test reports and supplier declarations.

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Annex A – Test Conditions and Simulants (Summary)

Overall Migration

The compliance assessment is based on migration testing using the following food simulants and conditions according to Regulation (EU) No. 10/2011:

Test	Solvent	Simulant	Test Conditions	Purpose
A	3% Acetic acid	B	2 h reflux (OM 5)	worst case for acidic media
	10Vol%Ethanol	A		
B	95 Vol% Ethanol	Instead of D2	2 h reflux (OM5) at 60°C	general aqueous foods
C	Isooctane	Instead of D2	4 d / 60°C	fatty foods

Test mode: Complete immersion, repeated contact: Multiple testing of the same sample with fresh simulant Total immersion (worst-case approach)

Specific Migration

Test simulants and test conditions for specific migration:

Test	Solvent	Simulant	Test Conditions	Purpose
D	95 Vol% Ethanol	Instead of D2	6 h / 60 °C	Fatty foods
E	Vegetable oil	D2	1 h / 121°C	Fatty foods

Test mode: Total immersion (worst-case approach)

Assessment:

The test conditions cover the intended conditions of use and represent a conservative evaluation.

Annex B – Referenced Test Reports and Documents

This declaration of compliance is based on the following technical documents:

- ISEGA test report No.: 16749/7-II
- Corresponding declaration of no objection: 59947 U 23
- Supplier declarations for PET monofilaments
- Supplier declarations for PUR edge reinforcement
- Raw material specifications and safety data sheets
- Internal assessments (NIAS, BPA, FDA)

Note: Full test reports, analytical raw data, and detailed substance lists (including NIAS screening) are part of the technical documentation and are available upon request

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Annex C – Definitions

OML (Overall Migration Limit):	Overall migration limit of 10 mg/dm² for plastic materials.
SML (Specific Migration Limit):	Specific limit for individual substances according to Annex I of Regulation (EU) No. 10/2011.
NIAS:	Non-intentionally added substances, e.g., by-products or degradation products.
Dual-Use Additives:	Substances approved both as food additives and as components of food contact materials.

Annex D – NIAS- Assessment Strategy (Toxicological)

The assessment of NIAS is carried out in accordance with Article 19 of Regulation (EU) No. 10/2011 and recognized guidelines (e.g., EFSA, JRC).

Approach:

- Screening using suitable analytical methods (e.g., GC-MS, LC-MS)
- Identification of relevant substances (where analytically feasible)
- Exposure estimation based on migration data or worst-case approaches

Assessment criteria:

- Application of the TTC concept (Threshold of Toxicological Concern)
- Consideration of available toxicological data
- Exclusion of CMR substances (where relevant)

Result:

Identified NIAS do not pose a health risk under intended conditions of use.

Note:

Detailed analytical results and evaluations are part of the technical documentation and available upon request.

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Annex E – FDA Compliance Statement (USA)

The materials used comply with the requirements of the relevant provisions of the Code of Federal Regulations (CFR), Title 21:

- 21 CFR § 177.1630 – Polyethylene terephthalate (PET)
- 21 CFR § 175.300 – Resinous coatings (where applicable to PUR components)

Assessment:

Compliance has been assessed based on supplier declarations, raw material specifications, and comparative extraction assessments.

Note:

Independent migration testing according to FDA requirements has not been performed in all cases; compliance is demonstrated via "compliance by composition" and "compliance by comparison".

The products are therefore suitable for indirect food contact under the cited regulations.

Annex F – Change Management and Version Control

This declaration of compliance is subject to documented change management.

Versioning:

- Version: Apr 2026
- Replaces all previous versions

Reasons for changes (typical):

- Changes in raw materials or suppliers
- Updates to regulatory requirements
- Updates to test reports or assessments

Review:

The declaration is reviewed regularly and on an ad hoc basis.

Traceability:

All changes are internally documented and traceable.

This declaration of conformity is based on the certificate of compliance 59947 U23 / ISEGA and the accompanying test report / Order No.: 16749/7-II

This declaration, including Annexes A–F, has been generated electronically and is valid without signature.

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