

DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME IN CONTACT WITH FOOD

MANUFACTURER

The manufacturer or his authorized representative established in the Community:

Name of the manufacturer: Packaging Donckers
Complete address: Kelderveld 8, 2500 Lier, Belgium
Contact: Mr. Van Humbeek
Email: info@packaging-donckers.com

Tel: +32(0)15.24.28.80
Fax: +32(0)15.24.28.81

PRODUCT DESCRIPTION

Product name: 2 SIDED non MF PET COATED RECYCLED CARDBOARD
Type of board: Recycled cardboard
Grammage cardboard: 1.5mm

COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food.
- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments.
- German Recommendation BfR XXXVI on paper and board for food contact
- Regulation 94/62/EG on packaging and packaging waste

In the following conditions of use:

Type of food intended to come into contact with material / article:

Packaging is suitable as primary packaging for all types of food with the exception of acidic food.

This material is not intended to come into contact with food for infants.

Storage time and temperature of the material / article:

To guarantee the product safety of the packaging, it is best packed inside stored protective against rain and snow. The packaging can be stored for a long time at room temperature or lower. The recommended storage conditions are at 50-55% relative humidity and 20-23° C. We recommend that these are processed within 12 months of the production date.

Possible treatment of the material / object:

Any long term storage at room temperature or below, including heating up to 70 °C for up

to 2 hours, or heating up to 100 °C for up to 15 minutes.

Surface area / volume ratio

Theoretical assumption that 1 kg of food is packed with 6dm² of packaging.

Our products are standard products, if they are suitable for packaging all food products with the exception of acidic food, then it is not possible to calculate the actual surface / volume ratio for all applications. As a result, we base ourselves on the theoretical assumption mentioned above.

GLOBAL MIGRATION

SIMULANTS AND TEST CONDITIONS

USED SIMULANT	CONTACT DURATION	CONTACT TEMPERATURE
Simulant A	10 days	40°C
Simulant D2: Isooctane*	10 days	40°C
Simulant D2: Ethanol 95%*	2 days	20 °C

*In accordance with European regulation 10/2011 / EC and amendments simulant D2 (vegetable oil) is the assigned simulant for fatty foods. Anyway, due to the technical problems, the test method for determining the global migration in olive oil is not suitable for cardboard packaging.

*In accordance with European regulation 2016/1416, the 95% ethanol and isooctane replacement simulant can be selected instead of olive oil when a migration test with olive oil is not feasible for technical reasons. The migration test with the replacement simulant D2 must be performed with adapted test conditions.

MIGRATION LIMITS

PARAMETER	LIMIT	SIMULANT	AVERAGE MEASURED VALUE
Global migration	< 10 mg/dm ²	Simulant A	0,5 mg/dm ²
		Simulant D2: Isooctane*	1,1 mg/dm ²
		Simulant D2: Ethanol 95%*	0,7 mg/dm ²

SPECIFIC MIGRATION

This material contains substances which are subject to restrictions on use in food or contain specific migration limits according to EU Regulation 10/2011. It is hereby stated that this restriction has been taken into use and the specific migration limits have not been exceeded.

PM REFERENCE	CAS	NAME	SML
/	/	Aluminium	1mg/kg
10060	0000075-07-0	Acetaldehyde	6mg/kg
10630	0000079-06-1	Acrylamide	Non detectable
10690	0000079-10-7	Acrylic acid	6 mg/kg
10780	0000141-32-2	Acrylic acid, n-butyl ester	6 mg/kg
11500	0000103-11-7	Acrylic acid, 2-ethylhexyl ester	0.05 mg/kg

PM REFERENCE	CAS	NAME	SML
11830	0000818-61-1	Acrylic acid, monoester with ethyleneglycol	6 mg/kg
13630	0000106-99-0	Butadiene	1 mg/kg in end product
17050	0000104-76-7	2-ethyl-1-hexanol	30 mg/kg
19150	0000121-91-5	Isophthalic acid	5,0 mg/kg
20020	0000079-41-4	Methacrylic acid	6 mg/kg
21130	0000080-62-6	Methacrylic acid, methyl ester	6 mg/kg
22450	0009004-70-0	nitrocellulose	60 mg/kg
23800	0000071-23-8	1-propanol	60 mg/kg
24910	0000100-21-0	Terephthalic acid	7,5 mg/kg
30140	0000141-78-6	acetic acid, ethyl ester	60 mg/kg
33801	/	N-alkyl(C10-C 13) benzenesulphonic acid	30 mg/kg
35760	0001309-64-4	Antimony trioxide	0,04*
42080	0001333-86-4	carbon black	60 mg/kg
66755	0002682-20-4	2-methyl-4-isothiazolin-3-one	0,5 mg/kg
77708	/	polyethyleneglycol (EO = 1-50) ethers of linear and branched primary (C8-C22) alcohols	1,8 mg/kg
77897	/	polyethyleneglycol (EO = 1-50) monoalkylether (linear and branched, C8-C20) sulphate, salt	5 mg/kg
86880	/	sodium monoalkyl dialkylphenoxybenzenedisulphonate	9 mg/kg
91530	/	sulphosuccinic acid alkyl (C4-C20) or cyclohexyl diesters, salts	5 mg/kg
91815	/	sulphosuccinic acid monoalkyl (C10-C16) polyethyleneglycol esters, salts	2 mg/kg
13326	0000111-46-6	Diethyleneglycol	30 mg/kg
15760			
47680			
16780	0000064-17-5	ethanol	60 mg/kg
52800			
16990	0000107-21-1	Ethyleneglycol	30 mg/kg
53650			

PM REFERENCE	CAS	NAME	SML
23830	0000067-63-0	2-propanol	60 mg/kg
81882			

*SML expressed as antimony

MOSH - MOAH

Contact conditions with simulant E (Tenax): 10 days - 40 ° C

	MEAN MIGRATION (MG/KG OF SIMULANT)	SPECIFIC MIGRATION LIMIT (MG/KG)
MOAH C16-35	< 0,15	0,5*
MOAH C20-35	< 0,6	/

* Limit taken from the German draft proposal

DUAL-USE ADDITIVES

Dual use additives according to Eu Vo 10/2011 are additives that are permitted for the production of plastic materials & articles and are simultaneously permitted as a food additive or flavor / color.

This material can contain the following dual use additives:

DUAL USE ADDITIVES*	E-N°
Calcium acetate	E263
Phosphoric acid	E338
Silicium Dioxide	E551
Potassium hydroxide	E525
Propane-1,2-diol (Propylene glycol)	E1520
Titanium dioxide	E171
Carbon black	E153

FLUORIDIZED SUBSTANCES

(Danish Order on food contact materials nr. 681 25 May 2020)

We herewith declare that based on information given by our suppliers; PFAS (PFOA and PFOS) components have not been added to the board during manufacturing. However an absolute absence cannot be given due to the use of recovered paper as raw materials.

VALIDITY

This statement is valid until 20.07.2022

DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.

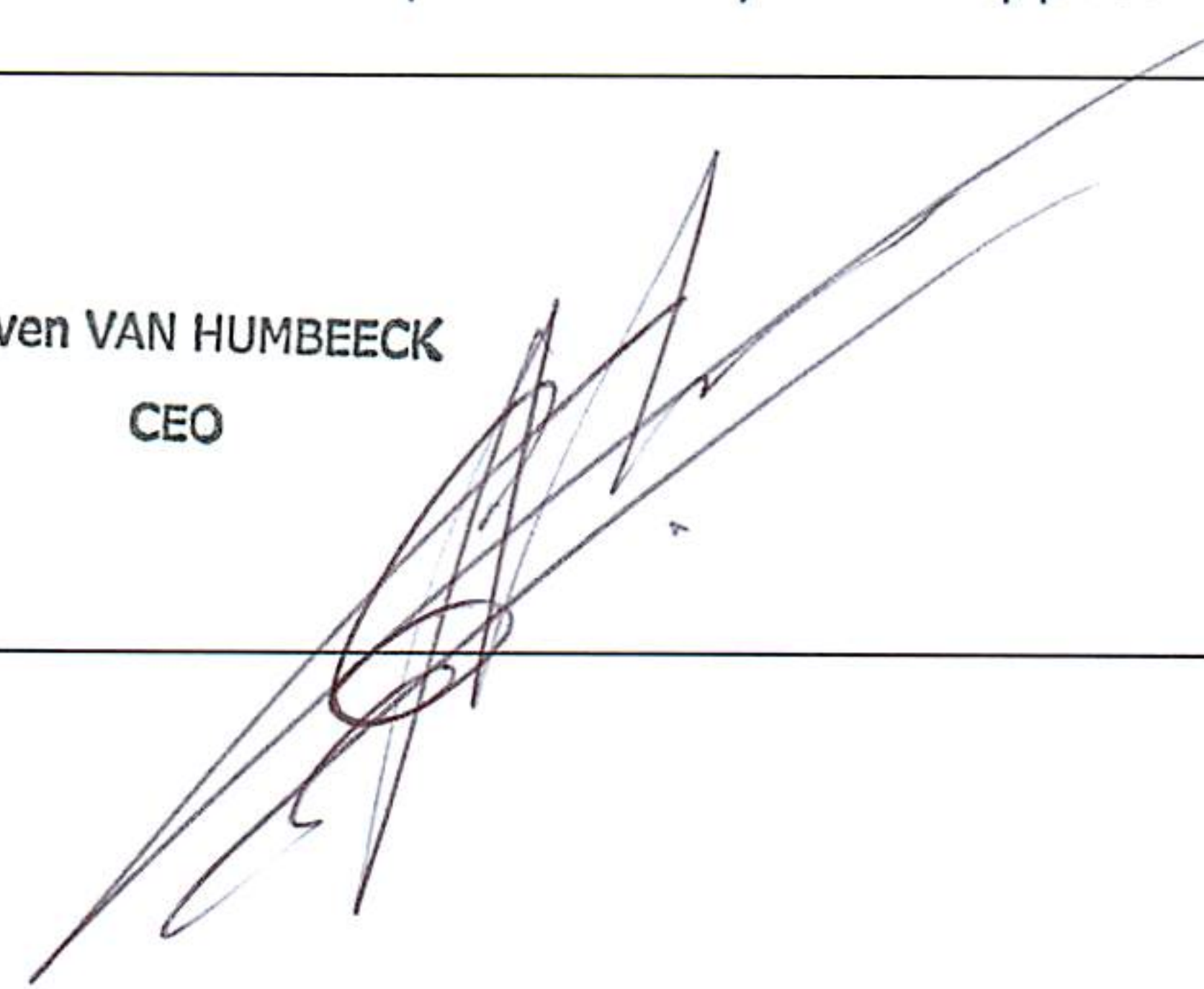
It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

The information stated in this statement was provided by the supplier of the relevant product(s).

Signature + stamp:

Steven VAN HUMBEECK
CEO



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PRODUCT DESCRIPTION

Product name: TWO SIDED metPET COATED RECYCLED CARDBOARD
Type of board: Recycled cardboard
Grammage cardboard: 1.5 mm

COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food
- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments
- Directive 94/62/EC on Packaging and Packaging Waste
- KB 11th of May 2005: Concerning materials and articles intended to come into contact with foodstuffs

In the following conditions of use:

Type of food intended to come into contact with material / article:

The PET laminated solid board may come in direct contact with all types of foodstuffs. This material is not intended to come into contact with food for infants.

Storage time and temperature of the material / article:

The packaging materials preferred storage conditions are at room temperature and protected from direct sunlight exposure. Storage temperature range: between minus 25°C and 40°C. Outside these ranges, we cannot guarantee the performance of the packaging. Exposed to direct sunlight will influence the performance, although not this has not been investigated to what degree. Maximum storage age before using is up to two years, under the mentioned preconditions.

Possible treatment of the material / object:

Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.

Surface area / volume ratio

The volume/ contact area was chosen 100 ml and 1.9 dm².

MIGRATION

SIMULANTS AND TEST CONDITIONS

USED SIMULANT**	CONTACT DURATION	CONTACT TEMPERATURE
Simulant A: 10% ethanol	10 days	40°C
Simulant D2: Isooctane*	10 days	40°C
Simulant D2: Ethanol 95%*	2 days	20 °C

*In accordance with European regulation 10/2011 / EC and amendments simulant D2 (vegetable oil) is the assigned simulant for fatty foods. Anyway, due to the technical problems, the test method for determining the global migration in olive oil is not suitable for cardboard packaging.

*In accordance with European regulation 2016/1416, the 95% ethanol and isooctane replacement simulant can be selected instead of olive oil when a migration test with olive oil is not feasible for technical reasons. The migration test with the replacement simulant D2 must be performed with adapted test conditions.

**Testing with simulant B not applicable (cfr. VO 10/2011: "However, if no substances are present that can react with acidic food simulant or foodstuffs, the test with food simulant B can be omitted.")

MIGRATION LIMITS

PARAMETER	LIMIT	SIMULANT	AVERAGE MEASURED VALUE
Global migration	< 10 mg/dm ²	Simulant A: 10% ethanol	<0,5 mg/dm ²
		Simulant D2: Isooctane*	<0,5 mg/dm ²
		Simulant D2: Ethanol 95%*	<0,5 mg/dm ²

Specific migration

Specific migration on BPA and MOSH/MOAH have been performed in accordance with Commission Regulation (EU) No 10/2011 (and amendments) relating to plastic materials and articles intended to come in contact with food.

Tests were performed according to EN 13130-1; Guide to test methods for the specific migration of substances from plastics to foods and food simulants and the determination of substances in plastics and the selection of conditions of exposure to food simulants.

DUA's

This product contains no Dual-Used-Additives as referred to in Article 11.3 of Regulation (EU) No 10/2011.

FLUORIDIZED SUBSTANCES

(Danish Order on food contact materials nr. 681 25 May 2020)

We use no active fluorinated substances in our product. We cannot guarantee that there is a trace range of fluorinated substances in our filler, the PET lamination guarantees that there will be no migration.

VALIDITY

This statement is valid until 26.04.2022

DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.

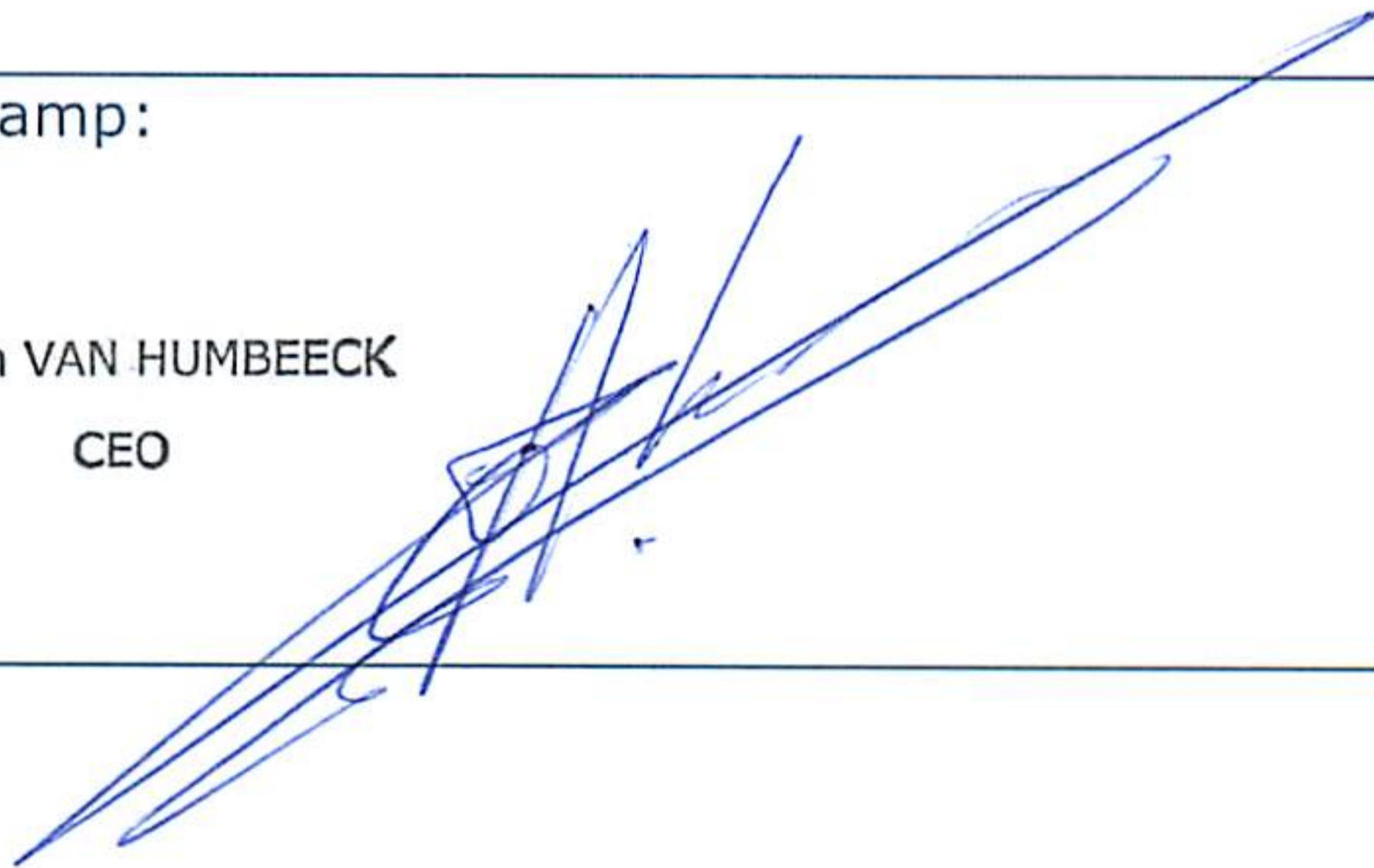
It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

The information stated in this statement was provided by the supplier of the relevant product(s).

Signature + stamp:

Steven VAN HUMBEECK
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PRODUCT DESCRIPTION

Product name: TWO SIDED PET COATED RECYCLED CARDBOARD
Type of board: Recycled cardboard
Type of PET: (metallic) colors
Grammage cardboard: 1.5 mm

COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food.
- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food and its amendments
- BfR Recommendation XXXVI, Paper and Board, with limitations mentioned in instructions for safe and appropriate use.
- Directive 94/62/EC Concerning Packaging and packaging waste and its amendments

In the following conditions of use:

Type of food intended to come into contact with material / article:

The overall migration results shows that the PET coated side of this material may be used in contact with all types of foodstuff.

This material is not intended to come into contact with food for infants.

Storage time and temperature of the material / article:

To guarantee the product safety of the packaging, it is best packed inside stored protective against rain and snow. The packaging can be stored for a long time at room temperature or lower. The recommended storage conditions are at 50-55% relative humidity and 20-23° C. We recommend that these are processed within 12 months of the production date.

Possible treatment of the material / object:

Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.

Surface area / volume ratio

Theoretical assumption that 1 kg of food is packed with 6dm² of packaging.

Our products are standard products, if they are suitable for packing all food products then it is not possible to calculate the real surface / volume ratio for all applications. As a result, we base ourselves on the theoretical assumption mentioned above.

GLOBAL MIGRATION

Overall Migration			
Simulant	Conditions	Result	*Due to the nature of some of the samples, it is technically not possible to extract Olive oil, therefore for some samples 95% ethanol and Isooctane are used as simulant.
A: (10% ethanol)	10 Days @ 40°C	<10 mg/dm ²	
B: (3% acetic acid)	10 Days @ 40°C	<10 mg/dm ²	
D2: (Olive oil)*	10 Days @ 40°C	<10 mg/dm ²	
(95% ethanol)*	10 Days @ 40°C	<10 mg/dm ²	
(Iso-octane)*	2 Days @ 20°C	<10 mg/dm ²	

SPECIFIC MIGRATION

Specific Migration			
Simulant	Conditions	Simulant	Result
Antimony	10 Days @ 60°C	3% acetic acid	<0.04 mg/kg
Manganese	10 Days @ 60°C	3% acetic acid	<0.6 mg/kg
Diethylene glycol	10 Days @ 60°C	3% acetic acid	<30 mg/kg
Ethylene glycol	10 Days @ 60°C	3% acetic acid	<30 mg/kg
Isophthalic acid	10 Days @ 60°C	50 % ethanol	<5 mg/kg
Terephthalic acid	10 Days @ 60°C	50% ethanol	<7.5 mg/kg

MOSH - MOAH

The German solid board branch association VVK in 2017 has started the project „Inquiries on the migration of mineral oil hydrocarbons (MOSH/MOAH) from recovered paper based packaging into food under wet and cool conditions” in order to close the existing gaps of knowledge and to give an answer to the basic question, whether a migration of MOSH/MOAH substances from solid board packaging and crates actually can happen during storage under those conditions.

This question has now been answered by a scientific inquiry of the mineral oil migration behavior of solid board packaging with a clear NO.

BISFENOL A CONTENT

The Bisphenol-A content is regularly determined in SOLIDUS SOLUTIONS solid boards in the context of the assessment in relation with food contact regulations. Several reference texts have set a limit to the concentration of Bisphenol-A of solid boards intended for food contact. This limit is expressed in migration into food and the strictest limit value has been set to 0.05 mg/kg for wet and/or fatty food.

This product is compliant with this requirement.

In addition, Bisphenol A is not intentionally added in our processes during production,

neither in the used processing aids. Possible trace levels of Bisphenol A are linked to the recovered papers, that is used by us and other manufacturers of solid board. French Law No. 2012-1442 (24-12-12), amended by the decision QPC no. 2015-480, forbids presence of Bisphenol-A in food contact materials or articles intended for direct food contact. (Secondary and tertiary packaging are not subjected to this requirement).

For products like paper and board containing recycled materials, an absence of Bisphenol-A is technically not easily feasible, since the used raw materials may contain non-intentionally added Bisphenol-A. Therefore an indicative threshold is put in place by the French authorities of 2 mg/kg. Values of ≥ 2 mg/kg do not lead to a non-conformity.

FLUORIDIZED SUBSTANCES

(Danish Order on food contact materials nr. 681 25 May 2020)

We herewith declare that based on the best of our knowledge, test results and information given by our suppliers; PFAS (PFOA and PFOS) components have not been added to the board during manufacturing or are part of the product composition. However an absolute absence cannot be given due to the use of recovered paper and board as raw materials.

In relation to the Danish ban on fluoridized substances in food contact materials, tests are performed and the results confirm that these substances have not been added deliberately. Content levels are measured in the region of the stated indicator level, which confirms presence of traces through the use of recycled paper and board in our product.

Currently no methods are available to determine migration of the traces present.

DUAL-USE ADDITIVES

Metallized Polyester film can, depending on type, contain the following dual use additives subject to restriction in food as defined in Regulation (EU) 10/2011:

- E338
- E551

Their migration is within the limits of the overall migration.

FOOD ALLERGENS

We hereby confirm that, with reference to the EU Directive 1169/2011/EC, food allergens or products derived thereof are not intentionally added for the production of paperboard.

SENSORY ANALYSIS

Sensory Analysis (limit according BFRXXXVI paper and board for food contact)			
Parameter	Simulant	Result	Limit
Odour	Sunflower oil	0 (no recognizable deviation)	2.5
Taste	Sunflower oil	0 (no recognizable deviation)	2.5

PACKAGING AND PACKAGING WASTE DIRECTIVE

The paperboard complies with Packaging and Packaging Waste directive 94/62EC amended by Directive 2018/852/EC and Regulation 2009/219EC.

- The sum of lead, cadmium, mercury and hexavalent chromium in the board is less than 100 ppm (EN 13428)

- The level of substances hazardous to environment in the board is less than 0,1% (EN 13428)

REACH

All products we produce and supply are "articles" as defined in Article 3 of the REACH Regulation. Producers and suppliers of articles are according to Article 33 of the REACH Regulation required to provide information about SVHC substances included in the REACH SVHC Candidate List if such substance is present in a supplied article above 0.1 percent by weight. Delivered articles should furthermore comply with restrictions laid down in REACH annex XVII.

Our products do, according to our current data and information we have collected from our suppliers, not contain:

- substances from the candidate list over 0.1% w/w, unless communicated otherwise.
- substances restricted in our products by REACH annex XVII over their respective thresholds.

The above information is provided in good faith and is based on data considered accurate at the time of preparing this note. No warranty is expressed or implied regarding the completeness or accuracy of this data. As a producer, we depend on the information we receive from our suppliers. We cannot be held liable for damages or costs resulting from the use of or reliance on such information.

VALIDITY

This statement is valid until 30.06.2022.

DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.

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It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

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