

## 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 Humbeeck  
Email: [info@packaging-donckers.com](mailto:info@packaging-donckers.com)

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

### PRODUCT DESCRIPTION

Product name: TWO SIDED PET COATED VIRGIN CARDBOARD  
Type of board: Virgin cardboard  
Type of PET: gold/black  
Grammage cardboard: 325g/m<sup>2</sup>

### COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.<sup>1</sup>
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food<sup>2</sup>
- Directive 2023/2006 / EC. Concerning materials and articles which are intended to be brought into contact with foods.
- Recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 34th notification, federal law gazette 10, 14 (1967), including the 220th memorandum, Federal Health Journal 59, 1365-1368, state of 1 July 2016. (only applicable for the cardboard layer)

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

<sup>1</sup> Regulation (EC) no 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC – Article 16

<sup>2</sup> COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food and its amendments.

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 6dm<sup>2</sup> 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.

This declaration was made on the basis of:

1. The declaration of conformity provided by the producers of raw materials used for production
2. Global migration testing
3. Specific migration testing for BPA, MOSH/MOAH and PFOS/PFOA

**GLOBAL MIGRATION**

**SIMULANTS AND TEST CONDITIONS**

USED SIMULANT	CONTACT DURATION	CONTACT TEMPERATURE
Simulant A	10 days	40°C
Simulant B	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 mg/dm <sup>2</sup>
Global migration	< 10 mg/dm <sup>2</sup>	Simulant A	2.1
		Simulant B	<1
		Simulant D2: Isooctane*	<1
		Simulant D2: Ethanol 95%*	<1

Reminder on authorized overall migration limit:

- Aqueous simulants: 10 mg/dm<sup>2</sup> with a 1 mg/dm<sup>2</sup> analytical tolerance.
- Fatty simulants: 10 mg/dm<sup>2</sup> with a 3 mg/dm<sup>2</sup> analytical tolerance.

## 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.

Substances according to the Annex I of Commission Regulation 10/2011:

- 24910, terephthalic acid, CAS 100-21-0, 7,5 mg/kg
- 19150, isophthalic acid, CAS 121-91-5, 5,0 mg/kg
- 10060, acetaldehyde, CAS 75-07-0, 6,0 mg/kg
- 16990 – 53650, ethyleneglycol, CAS 107-21-1, 30 mg/kg
- 13326 – 15760 – 47680, diethyleneglycol, CAS 111-46-6, 30 mg/kg
- 35760, antimony trioxide, CAS 1309-64-4, 0,04 mg/kg (expressed as antimony)
- 10690, acrylic acid, CAS 79-10-7, 6 mg/kg
- 13720 – 40580, 1,4-butanediol, CAS 110-63-4, 5 mg/kg
- 86480, Sodium bisulphite CAS 7631-90-5, 10mg/kg
- 17260 – 54880, Formaldehyde CAS 50-00-0 SML= 15 mg/kg
- 19975 – 25420 – 93720, Melamine CAS 108-78-1, 2,5 mg/kg
- 19990, Methacrylamide CAS 79-39-0, 0,01 mg/kg
- 11710, Methyl acrylate CAS 96-33-3, 6 mg/kg
- 11470, Ethyl acrylate CAS 140-88-5, 6 mg/kg
- Butyl acrylate CAS 131-32-2, 6 mg/kg
- 20020, Methacrylic acid CAS 79-41-4, 6mg/kg
- 21130, Methyl methacrylate CAS 80-62-6, 6 mg/kg
- 20890, Ethyl methacrylate CAS 97-63-2, 6 mg/kg
- 20110, Butyl methacrylate CAS 97-88-1, 6 mg/kg
- 10780, N-butylacrylate CAS 141-32-2, 6mg/kg
- 11500, 2-ethylhexylacrylate CAS 103-11-7, 0,05mg/kg
- 11510 - 11830, Ethyleenglycolmonoacrylate CAS 818-61-1, 6 mg/kg
- 17050, 2-ethyl-1-hexanol CAS 104-76-7, 30 mg/kg
- 33801, n-alkyl(C10-C13)benzenesulphonic acid, CAS -, 30 mg/kg
- 77708, polyethyleneglycol (EO = 1-50) ethers of linear and branched primary (C8-C22) alcohols, CAS -, 1,8mg/kg
- 77897, polyethyleneglycol (EO = 1-50) monoalkylether (linear and branched, C8-C20) sulphate, salts, CAS -, 5mg/kg
- 86880, sodium monoalkyl dialkylphenoxybenzenedisulphonate, CAS -, 9 mg/kg
- 91530, sulphosuccinic acid alkyl (C4-C20) or cyclohexyl diesters, salts, CAS -, 5mg/kg
- 91815, sulphosuccinic acid monoalkyl (C10-C16) polyethyleneglycol esters, salt, CAS -, 2mg/kg
- Metals (Ba, Co, Cu, Fe, Li, Mn, Zn)

The composition of adhesive contain components not listed in the regulation EU 10/2011. For this materials opinions of the EFSA or the BFR Committee for Consumer Products are available. The following SMLs are defined:

- Silver chloride on titanium dioxide: 0,5mg Ag/kg food (EFSA Journal 2007; doi: 10.2903/j.efsa.2007.555)
- Mixture of CIT and MIT: 25µ/dm<sup>2</sup>; (EFSA Journal 2010; doi: 10.2903/j.efsa.2010.1541).
- Adipic acid dihydrazide: 0,05 mg/kg (EFSA Journal 2015; doi: 10.2903/j.efsa.2015.3961).
- 4-acryloamido-4methyl-2-pentanone: 0,05mg/kg( EFSA-Journal 2015; doi: 10.2903/j.efsa.2015.4283)
- Propylene based glycol ethers: 5mg/kg (17th session of the BfR Committee for

Consumer Products 2016)

### 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:

- E1520 propane- 1,2 diol
- E527 Ammonium Hydroxide
- E551 Silicon dioxide
- E338 Phosphoric acid
- E222 Sodium bisulphite

### FLUORIDIZED SUBSTANCES

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

#### SIMULANTS AND TEST CONDITIONS

- Food simulant: Distilled water
- Conditions: 10d. at 40°C
- S/V ratio for the results: 6 dm<sup>2</sup>/kg

#### MIGRATION LIMITS

	MEAN MIGRATION (µG/KG OF SIMULANT)	SPECIFIC MIGRATION LIMIT (µG/KG)
PFOA	< 0,003	/
PFOS	< 0,003	/

Based on the information given by our suppliers and de migration test above, we can declare that this article is manufactured without and fluorinated polymers and therefore also without fluorinated compounds (PFCs such as PFOS and PFOA).

### Bisphenol A (BPA)

#### SIMULANTS AND TEST CONDITIONS

- Food simulant: Ethanol 95%
- Conditions: 2d. at 20°C
- S/V ratio of the test : 3.53 dm<sup>2</sup>/kg
- S/V ratio for the results: 6 dm<sup>2</sup>/kg

#### MIGRATION LIMITS

	MEAN MIGRATION (µG/KG OF SIMULANT)	SPECIFIC MIGRATION LIMIT (µG/KG)
BPA	< 25	50

### MOSH - MOAH

#### SIMULANTS AND TEST CONDITIONS

- Food simulant: Ethanol 95%
- Conditions: 10d. at 40°C

- S/V ratio of the test : 20 dm<sup>2</sup>/kg
- S/V ratio for the results: 6 dm<sup>2</sup>/kg

**MIGRATION LIMITS**

	<b>MEAN MIGRATION (MG/KG OF SIMULANT)</b>	<b>SPECIFIC MIGRATION LIMIT (MG/KG)</b>
Mineral oil saturated: MOSH/POSH	< 0,1	0,5*
Mineral oil aromatics: MOAH	< 0,1	/

\* Limit taken from the German draft proposal

**VALIDITY**

This statement is valid until 18.11.2025

**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.

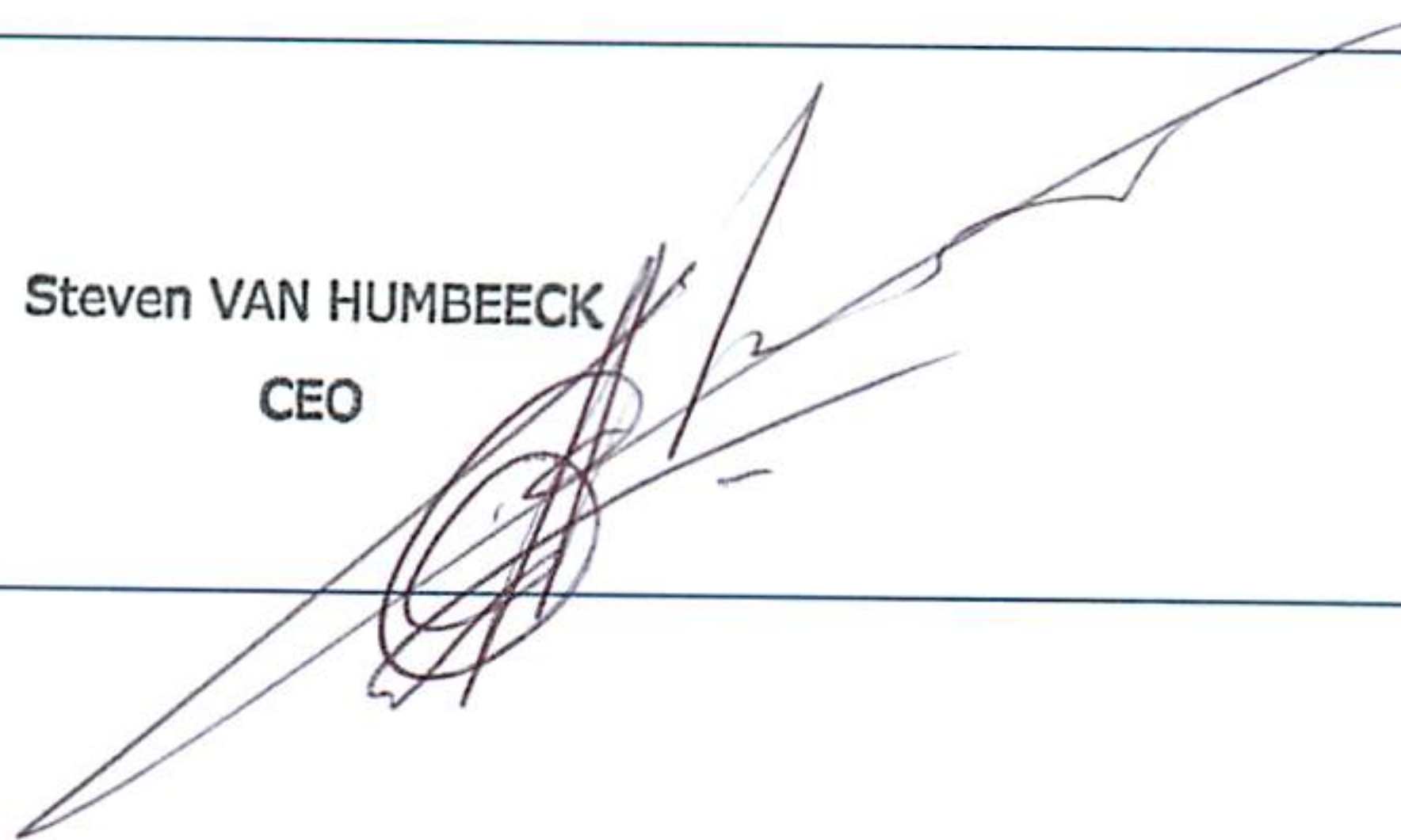
It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

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



## 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 Humbeeck  
Email: [info@packaging-donckers.com](mailto:info@packaging-donckers.com)

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

### PRODUCT DESCRIPTION

Product name: TWO SIDED PET COATED VIRGIN CARTBOARD  
Type of board: Virgin cardboard  
Type of PET: Metallic colors  
Grammage cardboard: 390 – 630 g/cm<sup>3</sup>

### DECLARATION OF SINGLE COMPONENT CONFORMITY

Product stated above complies with:

- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.<sup>1</sup>
- Directive 10/2011 / EC. Concerning plastic materials intended to come into contact with food<sup>2</sup>
- Directive 2023/2006 / EC. Concerning materials and articles which are intended to be brought into contact with foods.
- Recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 34th notification, federal law gazette 10, 14 (1967), including the 220th memorandum, Federal Health Journal 59, 1365-1368, state of 1 July 2016. (only applicable for the cardboard layer)

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

<sup>1</sup> Regulation (EC) no 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC – Article 16

<sup>2</sup> COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food and its amendments.

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 6dm<sup>2</sup> 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.

This declaration was made on the basis of:

1. The declaration of conformity provided by the producers of raw materials used for production
2. Global migration testing
3. Specific migration testing for MOSH/MOAH
4. Content testing for BPA

**GLOBAL MIGRATION**

**SIMULANTS AND TEST CONDITIONS**

USED SIMULANT	CONTACT DURATION	CONTACT TEMPERATURE
Simulant A	10 days	40°C
Simulant B	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 mg/dm <sup>2</sup>
Global migration	< 10 mg/dm <sup>2</sup>	Simulant A	1.3
		Simulant B	1.7
		Simulant D2: Isooctane*	0.6
		Simulant D2: Ethanol 95%*	1.1

Reminder on authorized overall migration limit:

- Aqueous simulants: 10 mg/dm<sup>2</sup> with a 1 mg/dm<sup>2</sup> analytical tolerance.
- Fatty simulants: 10 mg/dm<sup>2</sup> with a 3 mg/dm<sup>2</sup> analytical tolerance.

## SPECIFIC MIGRATION

### PET LAYER

Following monomers used for the PET layer are submitted to specific migration limits or restrictions as defined in the Regulation 10/2011/EC. These substances are listed below with the applicable restrictions.

Annex I	CAS Number	specific migration limit (SML) mg/kg
ETHYLENE and DIETHYLENE GLYCOL	107-21-1 & 111-46-6*	group restriction 2 : SML(T)= 30 expressed as ethyleneglycol
TEREPHTHALIC ACID	100-21-0	group restriction 28 : SML(T) = 7.5 expressed as terephthalic acid
ISOPHTHALIC ACID	121-91-5	group restriction 27 : SML(T) = 5 expressed as isophthalic acid
ACETALDEHYDE	75-07-0*	6 mg/kg (group restriction 1)

\* Non-intentionally added substances (NIAS) ; by-products from the PET polymerisation process, so some traces could be present in the above mentioned product

Annex II	Maximum content in the film % (w/w)	Specific Migration Limit (SML) mg/kg
ALUMINIUM	0,6	1
ANTIMONY	0,02	0,04
MANGANESE	0,004	0,6

The aluminium used complies with EN 602 standard "Aluminum and aluminum alloys – wrought products – Chemical composition of semi-finished products used for the fabrication of articles for use in contact with foodstuff"

The specific migration limits have been verified by calculation or by test on representative films according Regulation 10/2011/EC, 10 days/60°C, with the ratio film/mass of food 6 dm<sup>2</sup>/kg for all types of food. (for aluminium the compliance with SML had been checked on unmetallized side)

All colorants comply with Resolution AP (89) 1 on the use of colorants in plastic materials coming in contact with food.

### Adhesive

For the components listed below, restrictions apply which are to be followed with regard to the finished product which (may) come into contact with food:

Ref.-Nr.10690: SML = 6 mg/kg; Ref.-Nr.10780: SML = 6 mg/kg; Ref.-Nr.11500: SML = 0,05 mg/kg;  
Ref.-Nr.12100: SML = 0,01 mg/kg; Ref.-Nr.17050: SML = 30 mg/kg; Ref.-Nr.33801: SML = 30 mg/kg;  
Ref.-Nr.66755: SML = 0,5 mg/kg; Ref.-Nr.77708: SML = 1,8 mg/kg; Ref.-Nr.77897: SML = 5 mg/kg;  
Ref.-Nr.86880: SML = 9 mg/kg; Ref.-Nr.91530: SML = 5 mg/kg; Ref.-Nr.17260/54880: SML = 15 mg/kg;  
Ref.-Nr.52000: SML = 30 mg/kg

## 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 are neither used as raw material nor intentionally added in production of any board grade manufactured.

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



## 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°
Propaan-1,2-diol (Propeenglycol)	E1520
Ammonium Hydroxide	E527
Potassium Hydroxide	E525
Calcium acetate	E263
Phosphoric acid	E338
Silicon dioxide	E551

## Bisphenol A (BPA) content

	MEAN CONTENT (µG/KG OF material)
BPA	< 30

## MOSH - MOAH

### SIMULANTS AND TEST CONDITIONS

- Food simulant: Ethanol 95%
- Conditions: 2d. at 40°C

### MIGRATION LIMITS

	MEAN MIGRATION (MG/KG OF SIMULANT)	SPECIFIC MIGRATION LIMIT (MG/KG)
Mineral oil saturated: MOSH/POSH	< 0,1	0,5*
Mineral oil aromatics: MOAH	< 0,1	/

\* Limit taken from the German draft proposal

## VALIDITY

This statement is valid until 31.12.2022

## 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

