



## Declaration of Compliance VACo9o... & VAPo9o...

These products comply with the following legal requirements or recommendations :

- EU-Framework Regulation on materials and articles intended for food contact: (EC) No. 1935/2004
- Lebensmittel-, Futtermittel- und Bedarfsgegenständegesetzbuch (LFGB) §§30 and §§31
- Bedarfsgegenständeverordnung of April 10h, 1992
- Regulation (EU) No. 10/2011 relating to Plastic Materials and Articles intended to come in contact with foodstuffs 10/2011 including amendments and corrections 1282/2011, 1183/2012, 202/2014, 865/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/831, 2019/37, 2019/1338, 2020/1245, 2023/1442, 2023/1627, 2024/3190 & 2025/351.
- GMP-Regulation (EC) No. 2023/2006 of December 22nd, 2006 on good manufacturing practice for materials and articles intended to come into contact with food
- European Parliament and Council Directive 94/62/EC of December 20th, 1994 on packaging waste and the CONEG "Coalition of Northeastern Governors"
- Japanese food packaging positive list
- Swiss legislation on food contact materials - article 34 of the Foodstuffs and Utility Articles Ordinance SR 817.02
- Swiss Ordinance on materials and articles in contact with food SR 817.023.21

### **BfR**

The BfR recommendations deal with plastics and other high polymers for consumer goods that meet the requirements of § 64 of the German Food and Feed Code (Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch - LFGB). All plastics for which the monomers and additives are already regulated under Regulation (EU) No. 10/2011 are no longer listed in the revised version of the BfR recommendations and are covered by Regulation (EU) No. 10/2011.

Raw materials/composition comply with the following Bundesinstitut für Risikobewertung (BfR) recommendations:

### **Recommendation III/BfR (2021)**

Polyethylene



**Recommendation XIV/BfR (2022)**

Plastics Dispersions

**Recommendation X/BfR (2013)**

Polyamides

**Recommendation XXXVI/BfR (2022)**

Paper and board for food contact

**FDA**

Under suitable conditions of use the above mentioned laminate complies with the following FDA-regulations:

21 CFR 175.105 (rev. 2022) - Adhesives

21 CFR 177.1350 (2020) - Ethylene-vinyl acetate copolymers

21 CFR 177.1500 (2020) - Nylon resins.

21 CFR 177.1520 (2020) - Olefin polymers.

21 CFR 176.170 (rev. 2022) - Components of paper and paperboard in contact with aqueous and fatty foods.

For conditions A - H.

21 CFR 175.300 (rev. 2022) - Resinous and polymeric coatings.

21 CFR 175.320 (2020) - Resinous and polymeric coatings for polyolefin films.

21 CFR 177.1395 (2020) - Laminate structures for use at temperatures between 120°F and 250°F (49-121°C)

Should be used only for laminates complying with .21.CFR.177.1395. Additionally, the product may be used in: cook-in-bag/package film applications and in multi-layer film applications at temperature up to 375°F for 4 hours.

21 CFR 172.480 (2020) – Silicon dioxide



## Migrational requirements

Type(s) of food intended to come into contact with the material:

all food types (EU)

Type(s) of food NOT intended to come into contact with the material:

no restriction

Duration and temperature of treatment and storage while in contact with the food:

Migration testing according OM 2: any long term storage at room temperature or below, including when packaged under hot-fill conditions, and/or heating up to a temperature T where  $70^{\circ}\text{C} < T < 100^{\circ}\text{C}$  for a maximum of  $t = 120/2^{((T-70)/10)}$  minutes (that is meaning: any long term storage at room temperature or below, including heating up to  $70^{\circ}\text{C}$  for up to 2 hours or heating up to  $100^{\circ}\text{C}$  for up to 15 minutes).

Ratio of the area of the food contact material to the volume used to determine the compliance of the plastic food contact material or article:

bis/up to  $15\ \mu\text{m}$  PA -->  $20\ \text{dm}^2 / 1\ \text{kg LM}$ ; bis/up to  $20\ \mu\text{m}$  PA -->  $15\ \text{dm}^2 / 1\ \text{kg LM}$ ; bis/up to  $30\ \mu\text{m}$  PA -->  $10\ \text{dm}^2 / 1\ \text{kg LM}$ ; bis/up to  $40\ \mu\text{m}$  PA -->  $7\ \text{dm}^2 / 1\ \text{kg LM}$ ; bis/up to  $70\ \mu\text{m}$  PA -->  $4\ \text{dm}^2 / 1\ \text{kg LM}$

The global migration values are lower than the threshold values of  $10\ \text{mg}/\text{dm}^2$  (für the above-mentioned conditions of use). The tests are performed according to Art. 17 and 18 of Regulation (EU) No 10/2011 in conjunction with Annex V.

## Specific migration limit (SML- / QM-values)

| Name of substance                                | FCM No  | CAS          | Restrictions   | Validation by        |
|--|---------|--------------|----------------|----------------------|
| 2,6-DI-tert-BUTYL-p-CRESOL (BHT)                 | 315     | 0000128-37-0 | SML 3 mg/kg    | supplier declaration |
| 4-tert-BUTYLPHENOL                               | 186     | 0000098-54-4 | SML 0.05 mg/kg | supplier declaration |
| ACETIC ACID                                      | 115; 10 | 0000064-19-7 | SML 60 mg/kg   | supplier declaration |
| ACETIC ACID, VINYL ESTER                         | 231     | 0000108-05-4 | SML 12 mg/kg   | supplier declaration |
| Aluminium (Al), incl. fibres, flakes and powders | 501     | 0007429-90-5 | SML 1 mg/kg    | supplier declaration |



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|  |     |              |                          |                      |
|--|-----|--------------|--------------------------|----------------------|
| CALCIUM CARBONATE  | 21  | 0000471-34-1 | SML 60 mg/kg             | supplier declaration |
| CAPROLACTAM  | 212 | 0000105-60-2 | SML15 mg/kg              | Supplier declaration |
| CITRIC ACID  | 139 | 0000077-92-9 | SML 60 mg/kg             | supplier declaration |
| Copper (Cu)  |     | 0007440-50-8 |                          | supplier declaration |
| Diethyleneglycol   | 263 | 0000111-46-6 | SML 30 mg/kg             | supplier declaration |
| Ethylene oxide   | 129 | 0000075-21-8 | QM 1 mg/kg DL 0.01 mg/kg | supplier declaration |
| Ethylenimine   | 334 | 0000151-56-4 | DL 0.01 mg/kg            | supplier declaration |
| Formaldehyde   | 98  | 000050-00-0  | SML 15 mg/kg             | supplier declaration |
| Hexafluoropropylene  | 282 | 0000116-15-4 | DL 0.1 mg/kg             | supplier declaration |
| Maleic acid  | 248 | 0000110-16-7 | SML 30 mg/kg             | supplier declaration |
| Maleic anhydride   | 234 | 0000108-31-6 | SML 30 mg/kg             | supplier declaration |
| Nickel (Ni)  |     | 0007440-02-0 |                          | supplier declaration |
| Octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate  | 433 | 0002082-79-3 | SML 6 mg/kg              | supplier declaration |
| Polyethyleneglycol 200   | 638 | 0025322-68-3 | SML 60 mg/kg             | supplier declaration |
| Polyethyleneglycol sorbitan monolaurate  | 568 | 0009005-64-5 | SML 60 mg/kg             | supplier declaration |
| Polyvinylidene Fluoride  |     | 0024937-79-9 |                          | supplier declaration |
| Propylene oxide  | 135 | 0000075-56-9 | QM 1 mg/kg DL 0,01 mg/kg | supplier declaration |
| Phosphorous acid, mixed 2,4-bis(1,1-dimethylpropyl)phenyl and 4-(1,1-dimethylpropyl)phenyl triesters | 974 | 0939402-02-5 | SML 10 mg/kg             | supplier declaration |
| Polyethyleneglycol (EO=1-50) ethers of linear and branched primary (C8-C22) alcohols                 | 799 |              | SML 1.8 mg/kg            | supplier declaration |
| Silicon dioxide  | 504 | 0007631-86-9 |                          | supplier declaration |
| Triisopropanolamine  | 292 | 0000122-20-3 | SML 5 mg/kg              | supplier declaration |
| Talcum   | 615 | 0014807-96-6 | SML 60 mg/kg             | supplier declaration |
| Zinc stearate  | 106 | 0000557-05-1 | SML 5 mg/kg              | supplier declaration |



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|------------|-----|--------------|-------------|----------------------|
| Zinc oxide | 402 | 0001314-13-2 | SML 5 mg/kg | supplier declaration |
| Zinc (Zn)  |     | 0007440-66-6 |             | supplier declaration |

Substances subject to SML or QM values are used and named, the compliance of the limits is confirmed for the stated types of food and conditions of application.

**List of Additives with limits in foodstuff ("dual use additives")**

| Name of substance                                | FCM No  | CAS          | E no.   |
|--|---------|--------------|---------|
| 2,6-DI-tert-BUTYL-p-CRESOL (BHT)                 | 315     | 0000128-37-0 | E 321   |
| ACETIC ACID                                      | 115; 10 | 0000064-19-7 | E 260   |
| Aluminium (Al), incl. fibres, flakes and powders | 501     | 0007429-90-5 | E 173   |
| CALCIUM CARBONATE                                | 21      | 0000471-34-1 | E 170   |
| CITRIC ACID                                      | 139     | 0000077-92-9 | E 330   |
| Calcium stearate                                 | 106     | 0001592-23-0 | E 470 a |
| POLYETHYLENEGLYCOL 200                           | 638     | 0025322-68-3 | E 1521  |
| POLYETHYLENEGLYCOL SORBITAN MONOLAUATE           | 568     | 0009005-64-5 | E 432   |
| SILICON DIOXIDE                                  | 504     | 0007631-86-9 | E 551   |
| Talcum   | 615     | 0014807-96-6 | E 553b  |

Information about dual use additives according to Regulation (EU) No. 10/2011.

The following table lists group SML and other substances that may be present in traces:

| Substance(s)                      |
|-----------------------------------|
| Acetaldehyde (CAS-No. 75-07-0)    |
| Antimony (Sb) (CAS-No. 7440-36-0) |
| Arsenic (As) (CAS-No. 7440-38-2)  |
| Barium (Ba) (CAS-No. 7440-39-3)   |
| Ingredients of animal origin      |
| Lead (Pb) (CAS-No. 7439-92-1)     |
| Cadmium (Cd) (CAS-No. 7440-43-9)  |



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| Chlorine/ chlorinated compounds  |
| Chromium (Cr) (CAS-No. 7440-47-3)  |
| Cobalt (Co) (CAS-No. 7440-48-4)  |
| 1,4-Dioxane (CAS-No. 123-91-1)   |
| Iron (Fe) (CAS-No. 7439-89-6)  |
| Ethylbenzene (CAS-No. 100-41-4)  |
| Ethyleneimine (CAS-No. 151-56-4)   |
| Formaldehyde (CAS-No. 50-00-0)   |
| Copper (Cu) (CAS-No. 7440-50-8)  |
| Methanol (CAS-No. 67-56-1)   |
| N-hexane (CAS-No. 110-54-3)  |
| Nickel (Ni) (CAS-No. 7440-02-0)  |
| Palm oil (Derivate)  |
| Plant origin, possibly GMO   |
| Plant origin, not GMO  |
| Mercury (Hg) (CAS-No. 7439-97-6)   |
| Silica (quartz) (CAS-No. 14808-60-7)   |
| Tetrahydrofuran / tetrahydrofuran (CAS-No. 109-99-9)   |
| This product may contain minor trace amounts of metals, which are regulated with a specific migration limit in EU (Commission Regulation 10/2011 as amended; Annex II)** |

These metals are not intentionally added but may be present as impurity of the raw materials used. Migration tests on representative polyolefin samples showed a migration level below the SMLs, thus exceeding these SMLs under foreseeable conditions of use involving food contact is not reasonably expected.



## Functional barrier

If a functional barrier is used in a multi-layer material, we declare that the material complies with the requirements of Article 13 (2), (3) and (4) or Article 14 (2) and (3) of the Regulation (EU) No. 10/2011.

## General Information

In terms of EU-framework Regulation (EC) No. 1935/2004 and §§ 30 and 31 LFGB, published in the Bundesgesetzblatt (Federal Law Gazette) No 55 of 6.09.2005 there are no objections against the use of the product for the manufacture of articles intended for food contact.

This declaration is valid for the product delivered by us as specified above. The Regulation (EU) No. 10/2011 provides guidelines for the selection of test conditions to be used for various food products. According to that and under consideration of the food contact conditions stated, the product complies with the stipulations of these Regulations regarding the packaging of food products to be packed. The user shall verify himself that the product is suitable for the intended food to be packed beyond the stipulations of the Directives.

In particular it is emphasized that in case of printed material, no contact is allowed between the printing ink and the food product.

This document is valid from the date of issue until this document is superseded. Should there be any changes, the affected part of the declaration of conformity loses its validity. The validity of the other points remains. Further information on conformity can be found in our "Regulatory Information Sheet".

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Responsible Quality  
EuralPack nv