



Declaration of Compliance VACogo... & VAPogo...

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°C for up to 2 hours or heating up to 100°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 $15\text{ }\mu\text{m}$ PA --> 20 dm^2 / 1 kg LM; bis/up to $20\text{ }\mu\text{m}$ PA --> 15 dm^2 / 1 kg LM; bis/up to $30\text{ }\mu\text{m}$ PA --> 10 dm^2 / 1 kg LM; bis/up to $40\text{ }\mu\text{m}$ PA --> 7 dm^2 / 1 kg LM; bis/up to $70\text{ }\mu\text{m}$ PA --> 4 dm^2 / 1 kg LM

The global migration values are lower than the threshold values of 10 mg/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 MONOLAURATE	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