

We, hereby state the following with respect to the packaging:  
**Carmine tray (costumer reference; A019192)**

Our reference: **1/15/9279**

We supply to the company: **J&S Packaging**

is produced in accordance with the state of the art and our GMP/HAACP procedures and does not contain any substances which might cause harm to human health, provided the packaging material is used in the proper way and for the proper purpose.

The two central regulations on food requisite articles with direct legal impact in the European Union include:

- European framework regulation 1935/2004/EC on 'Materials and articles intended to come into contact with food' and
- European regulation 2023/2006/EC on 'Good manufacturing practice for materials and articles intended to come into contact with food'

We confirm that we have implemented a suitable and appropriate quality assurance and control system for the production of food packaging according to the principles of good manufacturing practice in accordance with Articles 5 and 6 of Regulation 2023/2006/EC and we continually undertake the associated documentation.

The packaging material has been produced respecting Directive 94/62/EC and Regulation 1907/2006/EC and does not contain SVHC (Substances of Very High Concern) in a concentration above 0.1% (weight).

Neither nanotechnology nor nanoparticles that develop special properties on the basis of new active nanotechnologies are knowingly used.

Concerning the individually used packaging and materials for the manufacture of folding boxes:

### **1. Cardboard**

For the supplied packaging only recycled board according to DIN 19303, paragraph 3.2.1. is used. The corresponding documents of compliance with relevant European Regulations and Recommendations for food contact are made out by the board supplier and are on file with us (e.g. BfR recommendation XXXVI, Regulation 1935/2004/EC, Regulation 2023/2006/EC, Resolution ResAP (2002)1, Directive 94/62/EC).

Fatty and moist foodstuffs and foodstuffs with large surfaces may only be packed using an appropriate intermediate packaging according to the preliminary remarks of the Recommendation XXXVI. The barrier of the intermediate packaging should be evaluated by testing the migration of MOSH and MOAH (mineral oil saturated hydrocarbons and mineral oil aromatic hydrocarbons) out of the recycled board through the intermediate packaging into the foodstuff.

### **2. Inks/Lacquers**

Printing inks and lacquers are only used on the non-food contact side. For these inks and lacquers corresponding certificates are available to us from the suppliers. These declarations relate to the sector standards issued by the European Printing Ink industry federation:

- 'EuPIA guideline for good manufacturing practice for the production of packaging print inks on the surface of food packaging and articles turned away from the food' (in the latest version)
- 'EuPIA guidelines for print inks for use on the surface of food packaging and articles turned away from the food' (in the latest version)
- 'EuPIA customer information on the use of sheet offset inks and lacquers (averting and/or oxidation drying or UV hardening) for the manufacture of food packaging' of 5 February 2009

Based on information retrieved from ink suppliers, inks are manufactured using only substances which are listed in Annex 1 (Lists 1 and 2) and Annex 6 of the Swiss Ordinance 817.023.21, Ordinance on Materials and Articles, „Verordnung des EDI über Bedarfsgegenstände“ („Bedarfsgegenständeverordnung“).

(Regulation (EU) No10/2011 has no direct and legally enforceable effect on packaging made of other materials than plastics, therefore this information is given herewith to enable the printer to comply with industry standards which are oriented to said Regulation as a guideline).



a) Substances for which no Specific Migration Limit (SML, QM) applies, thus only the potential contribution to exceeding the Overall Migration Limit (OML) needs consideration:

PM Ref N°	CAS-N°	Name
54450	-	Fats and oils, from animal or vegetable food sources <sup>a)</sup>
31336	-	Acids, fatty (C8-C22) from animal or vegetable fats and oils, esters with linear alcohols, aliphatic, monohydric, saturated, primary (C1-C22) <sup>b)</sup>
80000	9002-88-4	Polyethylene waxes
81840	57-55-6	1,2-Propandiol
35600	1336-21-6	Ammonium Hydroxide

a) Substances which largely crosslink via the oxidative pathway into a polymeric network, thus are not likely to exist any longer in relevant migrant amounts in the final printed and dried layer.

b) In: Provisional List of Additives, 8th update, for upcoming inclusion in the Plastic Directive

b) Substances for which a SML or a QM applies:

PM Ref N°	CAS-N°	Name	Restriction (SML, QM)	Restriction may be exceeded in the printed food packaging according to a worst-case calculation solely due to the contents present in the ink / lacquers <sup>b)</sup> (Y / N)
80077	68441-17-8	PE wax oxidised	60 mg/kg	N, based on screening test and according to worst case calculation
91680 or 91530	577-11-7	Diocylsulfosuccinate	5 mg/kg	N, based on screening test
34590-94-8	16670	Dipropylen glycoether	10 µg/kg	N, based on screening test
22210	98-83-9	Alpha-Methylstyrol	50 µg/kg	N, based on screening test
31920	103-23-1	Adipic acid, bis(2-ethylhexyl) ester	18 mg/kg	N, based on screening test
17050	104-76-7	2-ethyl-1-hexanol	30 mg/kg	N, based on screening test
10690	79-10-7	Acrylic acid	6 mg/kg	N, based on screening test
22210	98-83-9	Alpha-methylstyrene	0,05 mg/kg	N, based on screening test
11500	103-11-7	2-ethyl-hexyl-acrylate	0,05 mg/kg	N, based on screening test
10780	141-32-2	n-butylacrylate	6 mg/kg	N, based on screening test
21130	80-62-6	Methylmethacrylate	6 mg/kg	N, based on screening test
96214	1314-13-2	Zinc oxide	6 mg/kg	N, based on screening test
95859	-	Waxes, refined	6 mg/kg	N, based on screening test

This information is provided to allow other members of the packaging chain to calculate levels of compliance in regard to the Regulation (EU) No10/2011.

b) Standard assumptions for the worst-case calculation (OML, SML): 2 g/m<sup>2</sup> solid ink or varnish film; 100 % of surface is covered with ink; 6 dm<sup>2</sup> substrate wraps 1 kg foodstuff ("EU-cube"); 100% transfer of the migrant into the foodstuff; additionally, for QM-calculations the surface weight of the packaging material is assumed with 50 g per m<sup>2</sup>. The food manufacturer, packer, distributor has to verify if these conditions represent an adequately stringent worst-case scenario for his application.

\* according to Swiss FOPH (see also comments from BfR-Commission "Bedarfsgegenstände", 17.11.2009)

c) Substances of point a) and b) which fall under Art. 5a (Dual use substances):

PM Ref N°	CAS-N°	Name	E No.
81840	000057-55-6	1,2-Propandiol	E 1520
91680 or 91530	577-11-7	Diocylsulfosuccinate	-
-	142-16-5	Di-(2-ethylhexyl)maleate (DEHM, DOM)	-
-	1948-33-0	2-tert-butylhydrochinon	E 319

c) Dual use under Regulation (EU) No10/2011 and Directive 95/2/EC on food additives other than colours and sweeteners, and its amendments.

This information is provided to allow other members of the packaging chain to calculate levels of compliance in regard to the Regulation (EU) No10/2011.



**5. Extruded cardboard**

Declarations of conformity under (EU) No. 10/2011 are available to us from the supplier of plastic granulates used for extrusion coated items.

Based on information provided by raw material suppliers, a plastic layer extruded on the board for the packaging listed above will contain the following evaluated substances which are listed and/or restricted under the scope of the PIM (EU) No. 10/2011.

a) Substances for which a SML or a QM applies:

PM Ref. N°	CAS-N°	Name	Restriction (SML, QM)	Restriction may be exceeded in the final food packaging according to a worst-case calculation solely due to the contents present in the plastic <sup>e)</sup> (Y / N)
10690	79-10-7	Acrylic Acid	60 mg/kg	N, according to worst case calculation based on maximum plastic film (3 g/m <sup>2</sup> , 100% migration)
10120	0000108-05-4	Vinylacetat	12 mg/kg	N, according to worst case calculation based on maximum plastic film (3 g/m <sup>2</sup> , 0,1% in plastic 100% migration)
46640	128-37-0	3,5-di-tert-butyl-4-hydroxytoluen	3 mg/kg	N, listet in 95/02/EC as food additive

This information is provided to allow other members of the packaging chain to calculate levels of compliance in regard to the Regulation (EU) no. 10/2011.

e) Standard assumptions for the worst-case calculation (OML, SML)

b) Substances of point a.) which fall under Art. 5a (Dual use substances)<sup>f)</sup>:

PM Ref N°	CAS-N°	Name	E No.
46640	128-37-0	3,5-di-tert-butyl-4-hydroxytoluen	E 321

f) Dual use under Regulation (EU) no. 10/2011 and Directive 95/2/EC on food additives other than colours and sweeteners, and its amendments.

**6. Composition and use of the folding carton packaging**

**Carmine tray (costumer reference; A019192)**

Lacquer:	<b>Water based lacquer</b>
Inks:	<b>Mineral oil free vegetable low migration inks</b>
Board:	<b>Solidboard</b>
- Outside:	<b>GN4</b>
- Fluting:	
- Inside:	
Coating:	<b>20 gram LDPE on food contact side.</b>
Foodtype (dry, acid, fatty, alcoholic, moist, ...):	<b>Dry: * Fatty: * Alcoholic: *</b>
	<b>Acid: * Moist: ✓ Other:</b>
Contact type, time, temperature and duration of treatment and storage	<b>Direct contact</b>
	<b>Pre-frozen?: No</b>
	<b>Max. 25 °C in life cycle of 15 days.</b>
Ratio food contact surface to volume or weight:	<b>Inside surface carton 5 dm<sup>2</sup> for 300 gram food.</b>

**7. Technical and mechanical specifications**

This document does not provide any assurance or guarantee declaration about the mechanical suitability of the packaging for the planned purpose, just a declaration which certifies that the supplied packaging meets the legal food safety related requirements to the best possible extent.

The verification of the suitability of the packaging for the intended content, the behaviour of the food during and after packing as well as possible interactions between food and packaging (e.g. absorption of humidity and deformation of the packaging, absorption of fat and staining ...) are the responsibility of the user (food manufacturer, packer, distributor) and require suitable measures from this party where applicable.

