

Lebensmittelrechtliche Konformitätserklärung

Für unseren Artikel:

Party-Service-Karton groß 550x375x80mm

mit der folgenden Artikel-Nummer:

275537

Hiermit bestätigen wir auf der Grundlage der uns vorliegenden Lebensmittelunbedenklichkeitserklärung des Produzenten, dass die von uns oben genannten Artikel für den Kontakt mit Lebensmitteln geeignet sind und den dafür vorgesehenen Gesetzen sowie Richtlinien entsprechen.

Zum eigenen Schutz unserer Lieferquellen sind Vorlieferant und Untersuchungslabor sowie dritte beteiligte Personen unkenntlich gemacht. Die uns vorliegende Originalerklärung kann den zuständigen Behörden auf Verlangen zur Verfügung gestellt werden.

Unsere Bestätigung setzt voraus, dass der Packstoff sachgemäß weiterverarbeitet wird. Die spezielle Eignung dieses Packstoffes kann nur vom sachkundigen Füllguterzeuger oder Abpacker beurteilt werden.

Diese Konformitätserklärung ersetzt zuvor ausgestellte Konformitätserklärungen und besitzt eine allgemeine Gültigkeit ab Ausstellungsdatum bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 27.02.2023

Nette GmbH
Göttingen
[Handwritten Signature]

Lebensmittelunbedenklichkeitserklärung des Lieferanten:

ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

Declaration of Compliance to Regulatory Requirements for Paper and Paper Board

Trade name : Cyber XL Pac
Product description : Coated Folding Box Board (GC2)
Base board grammage : 200 g/m² to 450 g/m²
Coating : The Board is double coated on the top side
For more information, see technical specification.
Fiber source : Virgin fiber
Bleaching : All pulps used are elementary chlorine free (ECF-pulps)
Production site : Cyber XL Pac is manufactured at unit: Bhadrachalam
Producer : ██████████, Paperboards and Specialty papers Division

CUSTOMER NAME	████████████████████
SUBMITTED BY	████████████████████
DATE OF SUBMISSION	27/02/23

REMARKS:

This Compliance Certificate contains the following information about the Product

1. Specific instructions for safe and appropriate use
2. Food contact
 - 2.1. Raw Materials
 - 2.2. Analyses/FDA-extractions
 - 2.3. Analyses/ Paperboard
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 - 2.5. PCP in paperboard
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5. Certified management systems at the production site/sites
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1. Specific instructions for safe and appropriate use

Cyber XL Pac is intended for packaging dry foodstuffs, aqueous, acidic, low alcoholic < 5% (v/v) and fatty foodstuffs. The information given in this certificate is based on written confirmations of our chemical suppliers as well as evaluations and analyses made by and the certificate of compliance given by an independent research laboratory, TUV Labs, Product Certification Services.

Please note that the top clay coated side of the board is suitable for printing and is generally not intended for contact with any food.

Cyber XL Pac is suitable for use under the following conditions of temperature and time. Please also see storage conditions.

- Freezer/fridge (-20°C to 5°C more than 24 hrs)
- Room temperature (up to 40°C for more than 24 hrs)

With aqueous, acidic and fatty foodstuffs also

- Hot-fill (heating up to 70°C for up to 2h or heating up to 100°C for up to 15min)
- Microwave oven *
- Conventional oven (max. 220°C and 30 min)

* It is the responsibility of the packer of the finished packages to ensure that the package is safe to use in the intended conditions (W/min) taking into account all relevant information e.g. the shape and size of the package and packaged food.

2. Food contact

We hereby declare that the **Cyber XL Pac** before conversion complies where applicable and under foreseeable Conditions of use with the relevant requirements of:

Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food

Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

2.1. Raw materials

Paperboard

For the purpose to achieve high chemical and microbiological purity only virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms to established technology involving the use of generally recognized chemicals. All chemical additives used as raw materials for the paperboard are mentioned in the following regulations. Information below is based on the written confirmation of our chemical suppliers and analysis performed on the paperboard.

The **paperboard** complies where applicable and under foreseeable conditions of use with:

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- German BfR Recommendation XXXVI, Paper and board (2019)
- German BfR Recommendation XXXVI/2, Paper and board (2019)
- US FDA CFR 21, §176.170: Paper and Paperboard Components (2020)
- US FDA CFR 21, §176.180: Paper and Paperboard Components (2020)

Fluorescent whitening agents

We hereby confirm that fluorescent whitening agents or optical brightening agents are added in the production of the board.

2.2. Analyses / FDA-extractions

FDA-extractions

The following extractions have been performed on representative samples of **Cyber XL Pac** to meet the FDA 21 CFR §176.170 and 176.180 and BfR 36 BGVV Guidelines The limits stipulated in the FDA 21 CFR § 176.170 and 180, BfR 36 BGVV have not exceeded.

Simulant	Contact Time	Temperature	Extractives(mg/in ²)	LOQ (mg/in ²)
Water	2 hours	250°F	<0.5	≤ 0.5
Water	48 hours	70°F	<0.5	≤ 0.5
n-heptane	2 hours	150°F	<0.5	≤ 0.5
n-heptane	30 minutes	150°F	<0.5	≤ 0.5
n-heptane	2 hours	70°F	<0.5	≤ 0.5
n-heptane	30 minutes	70°F	<0.5	≤ 0.5
10 % alcohol	2 hours	150°F	<0.5	≤ 0.5
10 % alcohol	48 hours	150°F	<0.5	≤ 0.5
10 % alcohol	2 hours	70°F	<0.5	≤ 0.5
20 % alcohol	48 hours	70°F	<0.5	≤ 0.5
20 % alcohol	2 hours	150°F	<0.5	≤ 0.5
50 % alcohol	2 hours	150°F	<0.5	≤ 0.5
50 % alcohol	48 hours	70°F	<0.5	≤ 0.5
50 % alcohol	48 hours	70°F	<0.5	≤ 0.5
Acetic Acid	2 hrs	150°C	<0.5	≤ 0.5
Acetic Acid	48 hrs	70°C	<0.5	≤ 0.5

2.3. Analyses / Paperboard

Heavy metals in paperboard

The **Cyber XL Pac** complies with the requirements in BfR Empfehlungen XXXVI, Paper and Board (2009).

Cadmium (Cd)	< 0.1 mg/kg
Mercury (Hg)	< 0.1 mg/kg
Lead (Pb)	< 1 mg/kg
Arsenic (As)	< 0.1mg/kg
Antimony (Sb)	< 0.1mg/kg
Hexavalent Chromium	< 0.5mg/Kg
Tin	< 1mg/Kg
Tungsten	< 1mg/Kg
Gold	< 1mg/kg

2.4. RoHS Compliance

The **paperboard** complies with the requirements of **RoHS Directive 2011/65/EU**.

2.5. PCP in paperboard

The **paperboard** complies with the requirements for pentachlorophenol (PCP) in BfR Empfehlungen XXXVI, Paper and Board (2009). Analyses have been performed on representative board samples for pentachlorophenol (PCP) according to EN ISO15320. The amount of PCP is < 0.15 mg/kg which is the acceptable limit.

2.6. Antimicrobial test

The **paperboard** fulfils the requirements in BfR XXXVI. Determinations have been performed on representative board samples regarding the transfer of antimicrobial constituents according to EN 1104. There was no inhibition zone detected i.e there was no transfer of antimicrobial constituents. We do not add surface biocides on top of the board which can also be seen in the result.

2.7. Dioxin in paperboard

The content of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) expressed in World Health Organization (WHO) and NATO/CCMS toxic equivalents in paperboard are below 1 ng/kg board. The **paperboard** does **not** contain "dioxin-like" coplanar polychlorinated biphenyls (PCBs) above 0.1mg/dm² board.

2.8. Benzophenone in paperboard

The **paperboard** complies with the requirements for benzophenone in BfR Empfehlungen XXXVI(Annexe I). Analysis have been performed on representative board samples for benzophenone. The amount of benzophenone is < 0.1 mg/dm² which is the acceptable limit.

3. Substances / Paperboard

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide some specific characteristics, appearance or quality. Please note that we do not analyse the board for the substances listed below.

Nano Material: No Nano material is used in the manufacture of the product

3.1. GMO

We hereby confirm that genetically Modified Organisms (GMO) in accordance with "Environmental site on GMO" are **not** intentionally added in the production of board. Our suppliers can however not exclude adventitious and technically unavoidable contamination. This information is based upon information given by our chemical suppliers.

http://ec.europa.eu/environment/biotechnology/index_en.htm and

<http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/04/85&format=HTML&aged=0&language=EN&guiLanguage=en>

Regulation 1830/2003 on traceability and labelling of GMO: "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

3.2. Animal origin

We hereby confirm that no additive of animal origin is intentionally added in the production of board. This information is based upon information given by our chemical suppliers.

3.3. BSE

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and Creutzfeldt-Jakob Disease, JCD is intentionally added in the production of board. This information is based upon information given by our chemical suppliers.

3.4. Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the EU Directive 2003/89/EC, the following food allergens or products derived thereof are **not** intentionally added for the manufacture of board:

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof
- Nuts and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂.

Consequently, the products may reasonably be expected not to contain allergenic proteins. This information is based upon information given by our chemical suppliers.

3.5. Phthalates and Chemicals under RoHS

We hereby confirm that **no** phthalates and chemicals listed under RoHS are intentionally added in the production of **Cyber XL Pac**. This information is based upon information given by our chemical suppliers and tests done on the product.

3.6. Mineral oil migration (MOAH and MOSH):

ITC LTD –PSPD does not guarantee any limits on MOAH (Mineral oil aromatic hydrocarbons) and MOSH (Mineral oil saturated hydrocarbons) in this product. It can vary from lot to lot MOAH and MOSH can penetrate and migrate to the paper boards from other sources when suitable and acceptable barrier coatings are not provided. As per latest test report by 3rd party laboratory, MOSH & MOAH is not detected in the board.

3.7 Fluorine:

ITC LTD –PSPD confirms that Fluorine and Fluorine compounds are **not** present in this product and it is not detected. The Paperboard does not contain any traces of the fluorine and we do not use any Fluorine compounds in the process.

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4. Additional legislation and regulations, not food related

4.1. Packaging and Packaging Waste Directive

Cyber XL Pac complies with the Packaging and Packaging Waste directive 94/62/EC amended by 2004/12/EC.

- 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 the environment in the board is less than 0.1 % (EN 13428).

The board is suitable for recovery by:

- Material recycling (EN 13430)
- Energy recovery (EN 13431)

4.2. REACH (as per Jun2020 updated candidate list)

The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of properties of chemical substances. The REACH regulation gives greater responsibility to industry to manage the risks from chemicals and to provide safety information on the substances. REACH requires an extensive information exchange in the supply chain in order to fulfil all obligations.

Our obligations in REACH are as a downstream user and as a manufacturer of substances and articles. To secure REACH compliance from our suppliers we have insisted on compliance to REACH. For the substances that we manufacture and where REACH demands registration we have done or we will do the registrations according to the timelines set in the REACH regulation.

Cellulose pulp is defined as a substance and exempted from registration according to appendix IV. Our paper and board grades are defined as articles without intended release according to REACH. Consequently, this means that registration doesn't apply for our paper and board grades.

If any of our articles contains above 0.1% (w/w) of a Substance of Very High Concern that will be published on the [Candidate List](#) we will inform you as REACH requires. We continuously follow the development of the Candidate List and the substances for authorization. To our knowledge today none of our articles contain any Substance of Very High Concern that is on the Candidate List in a concentration above 0.1% (w/w).

5. Certified management systems at the production site/sites

Different Certifications are as follows: *Board production*

ISO 9001

ISO 14001

OHSAS 18001

FSC* CoC

BRC/IOP

6. Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 55-65 % relative humidity and 20-25° C. We recommend consumption within 12 months from manufacturing date and after this time rights of claims normally disappear.

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Disclaimer

It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application. This certificate and its contents are subject to the following additional limitations and disclaimers:

- Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.
- This certificate is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.
- This certificate is only valid to the extent it has been signed and delivered by an authorized employee of the ITC Ltd -PSPD group.
- Nothing in this certificate shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose, (c) the use, or the suitability for use, in connection with other products or materials, or (e) the safety or legality in any use, processing and handling of our products.
- This certificate forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this certificate.
- No one other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party

27th Feb 2023

[Redacted signature]

[Redacted signature]
Manager - Product Development

[Redacted signature]

DECLARATION OF CONFORMITY WITH THE REQUIREMENTS OF FOOD CONTACT LEGISLATIONS			
Revision No:	07/21-22 (B)	Date of Revision	01.03.2022

List of BOPET Films (-----Table-1-----)

Sr. No.	BOPET Film Type	Sr. No.	BOPET Film Type	Sr. No.	BOPET Film Type	Sr. No.	BOPET Film Type
1	J221 / J222	5	J466	9	J281 / J282	13	J951 / J953
2	J231 / J232 / J233 / J234	6	J511 / J512 / J538	10	J462	14	J802/ J806/J808
3	J 502 / J402	7	J261 /J262	11	J351/J352		
4	J 411 / J412	8	J271 / J272	12	J337		

(**): Including Metalized version of above mentioned grades of films.

Compliance Statement: The BOPET film types listed in Table-1 are complied with

1) Europe (EU Regulations)

- The films are in accordance with the European Regulation (EC) No 1935/2004 of 27th October 2004, The Regulation (EU) No 10/2011 of January 14th 2011 inclusive of all successive amendment up to (EU) 1245 / 2020 of 2nd September 2020.

- Commission Regulation (EU) No 321/2011
- Commission Regulation (EU) No 1282/2011
- Commission Regulation (EU) No 1183/2012
- Commission Regulation (EU) No 202/2014
- Commission Regulation (EU) No 2015/174
- Commission Regulation (EU) No 2016/1416
- Commission Regulation (EU) No 2017/752
- Commission Regulation (EU) No 2018/79
- Commission Regulation (EU) No 2018/213
- Commission Regulation (EU) No 2018/831
- Commission Regulation (EU) No 2019/37
- Commission Regulation (EU) No 2019/1338

The monomers and additives used to produce above listed products are listed in the Regulation (EU) No 10/2011 inclusive all amendments.

- The products are produced using Good Manufacturing Practice in accordance with Regulation (EC) No 2023 / 2006
- For traceability requirement, set out in article 17 of regulation (EC) 1935/2004, polyester films comply with traceability regulation.

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Revision No:	07/21-22 (B)	Date of Revision	01.03.2022
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- NIAS and degradation products: Annex IV paragraph 6 of regulation (EU) no 10/2011 refers to degradation for which restrictions and / or specifications are set out in annexes 1 and II to this regulation. The identified substances are listed in the declaration.
- (EU) 2018 / 852 of 30th May 2108 amending directive and Council Directive of 20 December 1994 on packaging and packaging waste – overall migration limit of heavy metals.
- 1895/2005/EC Commission Regulation of 18 November 2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food.
- Product comply with the BFR (German federal Institute for Risk Assessment) Recommendation XVII, Polyterephthalic acid diolesters intended to come into contact with food.
- German regulations

LFGB (German Food and Commodity Goods Law) and amendments
German Consumer Goods Ordinance (BedGgstV dd. 10.04.1992)

2) US FDA

- Code of Federal Regulations, issued by the Food and Drug Administration (FDA), paragraph 21 CFR 177.1630. Extraction results with test samples made of mentioned grade have shown that extraction limits of specification 177.1630, including sections f, g, and h, were not exceeded.
- All monomer and additives in the composition of above mentioned films appear in the positive list of products accepted for the manufacturing of packaging materials intended for food contact as published by the Food and Drug Administration (USA) FDA 21CFR 177.1630
- Identification of Types of foods expected to be used in contact with FCS and maximum temperature and time condition of food contact as per 21 CFR 177.1630
 - Condition of use: all type of foods excluding alcoholic beverages, at temperature not to exceed 250 deg. F and for alcoholic beverages that do not exceed 50 % by volume, at temperature not exceed 120 deg. F

US FDA 21 CFR 177.1630: Determination of amount of net chloroform soluble extractives

Extractants	Test condition	Results (mg/inch ²)	Maximum Permissible Limit (mg/inch ²)
Distilled Water	02Hours at 250°F	N.D. (<0.5)	<0.5
50% Ethanol (V/V Aqueous Solution)	24Hours at 120°F	N.D. (<0.5)	<0.5
n-heptane	02Hours at 150°F	N.D. (<0.5)	<0.5

3) EU: Conditions of use / Compliance with threshold values

- Risk has been assessed with the following assumption
1kg food packed with 6 dm² of packaging
- Types of food intended to come into contact with the film : All

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Revision No:	07/21-22 (B)	Date of Revision	01.03.2022
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- Duration and temperature of treatment and storage while in contact with food: Any long term storage at room temperature or below, including heating up to 100 °C for up to 4 hours,

3.1 OML:

The BOPET films types listed in Table-1 are subjected to Migration Tests at the conditions established by relevant EEC legislations. EC Directives (EU) 10/2011 limits the permissible global migration to 10mg/dm². [REDACTED] films meet the global migration limit under the following test conditions

Sr. No.	Name of Test	Result	Unit	Limits as per Standard
1	10% Ethanol (V/V Aqueous Solution)	<LOQ	mg/dm ²	10
2	3% Acetic Acid (W/V Aqueous Solution)	<LOQ	mg/dm ²	10
3	20% Ethanol (V/V Aqueous Solution)	<LOQ	mg/dm ²	10
4	Overall Migration with TENAX E	<LOQ	mg/dm ²	10
5	50% Ethanol (V/V Aqueous Solution)	<LOQ	mg/dm ²	10
6	95% Ethanol (V/V Aqueous Solution)	<LOQ	mg/dm ²	10
7	Veg. oil containing less than 1% unsaponified matter	<LOQ	mg/dm ²	10

3.2 SML:

The following limitations apply under Regulation (EC) 10/2011 as amended or as differently specified

FCM	PM refer.	CAS	Substance	SML(mg/kg)
398	35760	1309-64-4	Antimony trioxide (as antimony)	0.04
128	10060	75-07-0	**Acetaldehyde	6.0
227 / 263	16990 / 13326 / 15760	107-21-1 / 111-46-6	**EG / DEG	30.0
785	24910	100-21-0	**PTA	7.5
291	19150	0000121-91-5	**IPA	5.0
—	—	79-10-7	**Acrylic acid and its esters	6.0
—	—	79-41-4	**Methacrylic acid and its esters	6.0
505	86480	0007631-90-5	**Sodium bisulphite	10.0
239	19975	0000108-78-1	**2,4,6-triamino-1,3,5-triazine (Melamine)	2.5
149	19990	0000079-39-0	**Methacrylamide	ND (<0.01)
98	17260	0000050-00-0	**Formaldehyde	15.0
823	24887	—	**5-Sulphoisophthalic acid, salts	5.0

SML for metallized version (All metallized grades)				
FCM	PM refer.	CAS	Substance	SML (mg/kg)
		7429 - 90 - 5	Aluminium	1.0

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** The amount of the substances in the film is too low to reach the limit in the foodstuff, assuming complete transfer; the film complies as indicated in Reg (EU) 10/2011 and subsequent amendments and no further testing for specific migration is required.

3.3 Specific Migration of Phthalates:

Method: With reference to EN 13130-1:2004. Analysis was performed by GC-MS.
Simulant Used 95% Ethanol, Test Condition: 60°C for 10 Days (1st Migration)

Test Item	Result (mg/kg)	Reporting Limit (mg/kg)	Permissible Limit (mg/kg)
Dibutyl phthalate (DBP)	Not Detected	0.1	0.3
Benzyl butyl phthalate (BBP)	Not Detected	0.5	30
Bis-(2-ethylhexyl) phthalate (DEHP)	Not Detected	0.1	1.5
Diisononyl phthalate + Diisodecyl phthalate (DINP + DIDP)	Not Detected	0.5	9
Diallyl phthalate (DAP)	Not Detected	0.01	0.01

3.4 Specific Migration of Heavy Metals:

Method: With reference to EN 13130-1:2004. Analysis was performed by ICP-MS / ICP-OES.
Simulant Used: 3 % Acetic Acid(w/v) in aqueous solution, Test Condition: 60°C for 10 Days (1st Migration)

Test Item	Result (mg/kg)	Reporting Limit (mg/kg)	Permissible Limit (mg/kg)
Specific Migration of Aluminium	Not Detected	0.1	1
Specific Migration of Barium	Not Detected	0.25	1
Specific Migration of Cobalt	Not Detected	0.01	0.05
Specific Migration of Copper	Not Detected	0.25	5
Specific Migration of Iron	Not Detected	0.25	48
Specific Migration of Lithium	Not Detected	0.5	0.6
Specific Migration of Manganese	Not Detected	0.25	0.6
Specific Migration of Nickel	Not Detected	0.01	0.02
Specific Migration of Zinc	Not Detected	0.5	5
Specific Migration of Tungsten	Not Detected	0.03	0.05

4. Dual use additives

E Number	CAS	Additive	Max Content
E551	7631-86-9	Amorphous Silica	≤ 0.1%

5. NIAS and degradation products

Substance	FCM No.	CAS	PM refer.	SML (mg/kg)
Acetaldehyde	128	75-07-0	10060	6.0

6. Compliance Statement for European Economic Commission (EEC) Directive 94/62/EC.

In accordance with the essential requirements of the Directive 94/62/EC and its amendments up to and including (EU) 2018 / 213, polyester films are in conformity with EN 13427 requiring prevention and recovery (one form required):
 EN13428 -Prevention by source reduction-Compliant
 Heavy metals and other noxious/hazardous substances (CR 13695-1 and CR 13695-2)-Compliant
 EN13429 -Reuse-Optional-NA
 EN13430 -Recovery with material recycling-Recyclable
 EN13431 -Recovery in the form of energy-Compliant.
 EN13432 -Recovery in the form of composting-NA

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7. Compliance Statement for European Economic Commission (EC) Regulation 1895/2005 according to Framework Regulation 1935/2004/EC.

All the BOPET Film Types listed in Table 1 are free from epoxy derivatives as listed below.

- a. BADGE - 2, 2-bis (4-hydroxyphenyl) propane bis (2, 3-epoxypropyl) ether (CAS No 001675-54-3) and their derivatives.
- b. BFDGE - bis (hydroxyphenyl) methane bis (2, 3-epoxypropyl) ethers (CAS No 039817-09-9) and their derivatives.
- c. NOGE - Other Novolac Glycidyl Ethers and their derivatives.

8. Compliance Statement for European Economic Commission (EEC) Regulation 2023/2006/EC according to Framework Regulation 1935/2004/EC.

- [REDACTED] has been adopted good manufacturing practices (GMP) for all its packaging film manufacturing facilities including BOPET Films. It has full-fledged quality assurance and quality control department for monitoring and assuring the product qualities. Also [REDACTED] is certified for compliance with Quality Management System (QMS) ISO 9001:2008. The good manufacturing practices of [REDACTED] are in compliance with the Regulation (EC) No 2023/2006.

9. Japanese Food Sanitation Act:

On 28th April 2020, Japan's Ministry of Health, Labor and Welfare (MHLW) published the MHLW Notification No. 196 of 2020 for amending the MHLW Notification No. 370 of 1959. According to article 18 (Paragraph (3) prohibits the sale, manufacture for sale, and use for sale of food containers, packaging materials, and utensils that contain or bear any harmful or toxic substance which may be injurious to human health. The Ministry of Health, Labor and Welfare (MHLW) of Japan publicly announced the list of substances to be included in Japan's new positive list system for food container and packaging materials.

PL includes the lists of permitted substances shown below.

- Table 1(1) – Base Polymers (Plastics)
- Table 1(2) – Base Polymers (Coatings, Etc.)
- Table 1(3) – Minor Monomers List
- Table 2 – Additives, Coating Agents, Etc.

Based on our manufacturing process, formulation and the test conducted according to FDA and EC regulation, we hereby confirm that above mentioned products comply with this regulation.

10. China Food Safety Law:

The BOPET film types listed in Table-1 are complied with following statements:

China	<ol style="list-style-type: none">1. GB4806.7-2016: Standard for Food Safety Plastic materials and articles used for food contact.2. GB4806.6-2016: Standard for Food Safety Plastic resins used for food contact.3. GB4806.1-2016: Basic requirements, restrictions, compliance, test methods, traceability and product information requirements on food contact materials and articles4. GB9685-2016: (Appendix A/B/C) Hygienic Standards for Uses of Additives in Food Containers and Packaging Materials
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11. Other substances / Regulations:

We confirm that below listed substances are not intentionally used during any stage of manufacturing process of BOPET films by [REDACTED]. However, [REDACTED] does not exclude the possibility of trace levels of other substances may be present because of the specific characteristics of the raw materials for which we are currently not aware.

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- GMO (Genetically Modified Organisms)
- Radioactive Substances
- Allergens listed in Annex II of Regulation (EU) No 1169/2011 as amended
- Alkylphenols, alkylphenols ethoxylates, nonylphenols
- Bisphenols A, B, F, S
- Hydrocarbons (MOSH), (MOAH) and POSH
- Perfluoro compounds PFOA, PFAS, PAPs, PFCA, PFOS
- Polybrominated PBB, PBDE, PCB
- Polycyclic aromatic (PAH, PAA)

- Halogenated Flame Retardants
- Nano materials
- Ethylene oxide

- PVC
- Conflict Minerals
- Latex
- Persistent Organic Pollutants (POP)
- Asbestos
- Directive (EU) 2015/863 of 22nd July 2019 (ROHS III) compliance
- California Prop 65 Compliance

12. Additional Recommendations

Although aluminum, of which the metalized side of films consists, is generally recognized as physiologically harmless and thus safe for use in contact with food (application examples: frying pans, baking trays and household foil), we recommend not to use this side in direct food contact without a protective over-lacquer, since chemical reactions of the aluminum with certain food components may result in loss of barrier properties.

Disclaimer and Notes for Information Purpose

1. According to the EEC Directive / FDA Regulations, the Migration Limits has to be controlled on the finished articles intended to come in to contact with foodstuffs. Migration Tests on the final material or article will determine the regulatory suitability for contact with different food types and various end use applications.
2. Since the BOPET films are being converted to laminates and subjected to printing and lamination using different adhesives, printing inks, over print varnishes and other substrates, this is the responsibility of the converter / user of the BOPET films to determine and satisfy the regulatory suitability for food contact compliance of converted BOPET films.
3. However, these are beyond the control of [REDACTED], and hence [REDACTED] makes no warranties, express or imply and has no liability in connection with the regulatory suitability for food contact compliance of BOPET films.

For [REDACTED],

Head – Quality Assurance (BOPET)

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