

Lebensmittelrechtliche Konformitätserklärung

Für unseren Artikel:

Zellglas-Rll.50m lg.40cm br.

mit der folgenden Artikel-Nummer:

321041

Hiermit bestätigen wir auf der Grundlage der uns vorliegenden Lebensmittelunbedenklichkeits-erklärung 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 bis zum 31.12.2026 bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 01.10.2024

Nette GmbH
Göttingen
[Handwritten signature]

Lebensmittelunbedenklichkeitserklärung des Lieferanten:

ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

██████████TM NP

Declaration of Compliance

for materials and articles intended to come into contact with food

I Legal Basis

This declaration is issued in accordance with:

- Article 16(1) of Regulation (EC) No 1935/2004 ("Framework Regulation")
- Article 6 of Directive 2007/42/EC ("RCF Directive")

II Assurances

1 Identity and address of the business operator issuing the declaration of compliance:

Applicable entity from among the following:

Legal Entity Company Registration Number	Registered Office Address
██████████ ██████████ ██████████	██████████ ██████████ ██████████ ██████████
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Geschäftsführer: Dipl.-Kfm. Michael Nette
Steuer-Nr.: 20/210/22840
Amtsgericht Göttingen HRB 1028
USt-Id-Nr.: DE249606280
ZSVG-Nr.: DE 5544 530 633 838

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gekennzeichneten Artikel
sind FSC®-zertifiziert.



II Assurances continued

2 Identity and address of the business operator which manufactures the material:

██████████
██

3 Identity of the material:

This declaration applies to the following products supplied by ██████████ from its site in Wigton, United Kingdom:

- ██████████ TM **21NP** (marketed in Canada & the USA as ██████████ TM 80NP)
- ██████████ TM **23NP** (marketed in Canada & the USA as ██████████ TM 90NP)
- ██████████ TM **25NP** (marketed in Canada & the USA as ██████████ TM 95NP)
- ██████████ TM **28NP** (marketed in Canada & the USA as ██████████ TM 110NP)
- ██████████ TM **31NP** (marketed in Canada & the USA as ██████████ TM 125NP)
- ██████████ TM **35NP** (marketed in Canada & the USA as ██████████ TM 140NP)
- ██████████ TM **42NP** (marketed in Canada & the USA as ██████████ TM 165NP)

subsequently referred to as "██████████ TM NP" films.

██████████ TM NP films are uncoated regenerated cellulose films.

They are within the scope of Article 2(a) of Directive 2007/42/EC.

4 Date of the declaration:

This declaration was prepared on: **23 December 2024**

4a Period of supply for which this declaration is valid:

This declaration applies to consignments of ██████████ TM NP directly supplied by ██████████ in the period:

01 October 2024 to 31 December 2026

II Assurances continued

5 Confirmation that the material meets relevant requirements laid down in EU legislation for food contact materials and articles:

██████TM NP complies with the following:

a Regulation (EC) No 1935/2004 as amended by Regulation (EC) No 596/2009 and Regulation (EU) 2019/1381
(*"Framework Regulation" for food contact materials and articles*)

- Article 3 ("General requirements")
- Article 11(5) ("Community Authorisation": notification of new scientific or technical information for an authorised substance)
- Article 15 ("Labelling")
- Article 17 ("Traceability")

b Regulation (EC) No 2023/2006 as amended by Regulation (EC) No 282/2008
(*"GMP Regulation" for food contact materials and articles*)

- Article 4 ("Conformity with good manufacturing practice")
- Article 5 ("Quality assurance system")
- Article 6 ("Quality control system")
- Article 7 ("Documentation")

c Directive 2007/42/EC (unamended at current date)
(*"Regenerated Cellulose Films Directive" / "RCF Directive"*)

- Article 3

d NOT APPLICABLE

Regulation (EU) No 10/2011

as amended up to and including Regulation (EU) No 2023/1627

(*"Plastics Regulation" / "Plastics Implementing Measure" / "PIM"*)

██████TM NP films are NOT regulated as plastic food contact materials.

The EU rules for food contact plastic materials and articles – set out in Regulation (EU) No 10/2011 – do NOT apply to ██████TM NP. This statement remains valid for the applicability of Regulation (EU) No 10/2011 in the case of further amendments.

EU legislation does NOT require overall migration tests to be performed on ██████TM NP.

EU legislation does NOT require specific migration tests to be performed on ██████TM NP.

e NOT APPLICABLE

Directive 78/142/EEC including Corrigendum of 20.6.1978

(*"Vinyl Chloride Monomer Directive" / "VCM Directive"*)

██████ does NOT introduce vinyl chloride monomer, or materials prepared from vinyl chloride monomer, in the manufacture of ██████TM NP.

██████TM NP is outside the scope of the Directive.

f NOT APPLICABLE

Directive 93/11/EEC (unamended at current date)

(*"N-Nitrosamines- and N-Nitrosatable Substances Directive"*)

██████ does NOT introduce (i) N-nitrosamines; or (ii) substances capable of being converted into N-nitrosamines ("N-nitrosatable substances"), in the manufacture of ██████TM NP.

██████TM NP is outside the scope of the Directive.

II Assurances continued

5 Confirmation that the material meets relevant requirements laid down in EU legislation for food contact materials and articles continued

g NOT APPLICABLE

Regulation (EC) No 1895/2005 (unamended at current date)

(*"Epoxy Derivatives Regulation"/"Epoxy Regulation"*)

██████ does NOT introduce (i) BADGE or BADGE derivatives; (ii) BFDGE; or (iii) NOGE, in the manufacture of ██████TM NP.

██████TM NP is outside the scope of the Regulation.

h NOT APPLICABLE

Regulation (EU) No 2022/1616 (including Corrigendum of 21.09.2022)

(*"Recycled Plastics Materials and Articles Regulation"*)

██████ does NOT introduce any of the following categories of materials in the manufacture of ██████TM NP:

- "post-consumer materials"
including "post-consumer recycled materials," "post-consumer recovered materials" and "post-consumer plastic materials"
- "post-use materials"
including "post-use plastic materials" and "post-use plastic articles"
- "recycled plastic"
including "recycled plastic materials" and "recycled plastic articles"
- "post-consumer waste."

██████TM NP is outside the scope of the Regulation (see Article 1 of the Regulation).

i NOT APPLICABLE

Regulation (EU) 2018/213 (unamended at current date)

(*"Regulation on the use of bisphenol A in varnishes and coatings"*)

██████ does NOT introduce (i) bisphenol A (BPA); or (ii) epoxy resins based on bisphenol A (BPA), in the manufacture of ██████TM NP.

██████TM NP films are unvarnished, uncoated films and are outside the scope of the Regulation.

Confirmation that the material meets relevant requirements laid down in UK legislation for food contact materials and articles:

j Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019

██████TM NP complies with the applicable regulations in place to implement Regulation (EC) No. 1935/2004, Regulation (EC) No. 2023/2006 & Directive 2007/42/EC.

II Assurances continued

6 NOT APPLICABLE

Adequate information relative to the substances used or products of degradation thereof for which restrictions and/or specifications are set out in Annexes I and II to Regulation (EU) No 10/2011 to allow downstream business operators to ensure compliance with those restrictions:

■■■■■■■■■■TM NP films are NOT regulated as plastic food contact materials.

The EU rules for food contact plastic materials and articles do NOT apply to ■■■■■■■■■■TM NP.

The restrictions and specifications for substances set out in Annexes I and II to Regulation (EU) No 10/2011 do NOT apply to ■■■■■■■■■■TM NP.

Under the applicable food contact legislation, the substances authorised for use as components of uncoated regenerated cellulose films are regulated by maximum quantity limits (QM [% m/m in the film] or QMA [mg/dm² in the film]).

The regenerated cellulose film manufacturer is responsible for ensuring compliance with these restrictions.

The components are NOT subject to restrictions taking the form of Specific Migration Limits (SMLs).

7 NOT APPLICABLE

“Dual Use Substances” · “Dual Use Additives” · “Multiple Function Additives”

Adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria to enable the user of the material to comply with relevant EU provisions or, in their absence, with national provisions applicable to food:

■■■■■■■■■■TM NP films are NOT regulated as plastic food contact materials.

The EU rules for food contact plastic materials and articles do NOT apply to ■■■■■■■■■■TM NP.

The rules set out for plastic food contact materials in Article 11(3) of Regulation (EU) No 10/2011, regarding additives that are also authorised as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 (so-called “dual use substances” or “dual use additives” or “multiple function additives”), do NOT apply to ■■■■■■■■■■TM NP.

NOTE:

Regulation (EC) No 1333/2008 means that Regulation as amended up to and including Regulation (EU) 2024/2608 of 7 October 2024.

Regulation (EC) No 1334/2008 means that Regulation as amended up to and including Regulation (EU) 2024/2856 of 12 November 2024.

8 Specifications on use of the material:

NOTE 1:

The client should perform their own evaluations to verify the suitability of the film for their own proposed application. This includes verification of the technological suitability of the film, taking into account foreseeable conditions of use; and confirmation that the characteristics of the food product are acceptably maintained throughout. It is the sole responsibility of the client to determine whether the film under consideration is suitable for their own intended use.

It is the responsibility of the food packer to determine the shelf life of their own processed or packed food product including with regard to both food safety and food quality.

NOTE 2:

The information included in this section is based on the hypothesised use of the subject films as monoweb materials in applications that would involve direct contact between the film and the food.

The content of this section does not take into account subsequent processing or treatments, or the possible presence of other components (e.g. other substrates, adhesives, printing inks, varnishes) that could influence the food contact status of the final article.

It is the responsibility of the producer of the final material or article to cooperate with the food packer in order to identify the legislation applying to the proposed application and to ensure the compliance of the final material or article with the applicable requirements.

a Types of food with which it is intended to be put in contact.

The applicable specific measure of the food contact legislation does not lay down any restrictions on the types of foods with which **■■■■■**™ NP may be placed in contact.

Therefore, pursuant to the food contact legislation set out in section 5, **■■■■■**™ NP may legally be placed in contact with any type of food.

■■■■■ recommends that **■■■■■**™ NP films should not be used in monoweb form for the fabrication of packaging articles (e.g. bags or pouches) intended to hold liquid foods.

NOTE:

This recommendation is not related to food safety: it is based solely on the physical properties of the subject films.

b Time and temperature of treatment and storage in contact with the food.

Packaging Applications – Chilled/Temperate/Warm Fill/Hot Fill:

■■■■■™ NP films are legal for use in packaging applications where contact with food takes place under temperate or chilled conditions (temperature range: 0 to +40°C).

For such applications, the applicable legislation does not lay down any restriction on contact time.

■■■■■™ NP films are also legal for use in ordinary "warm fill" or "hot fill" food packing operations, where the filling operation involves contact with warm or hot foods (initial food temperature: up to +100°C).

For such applications, the applicable legislation again does not lay down any restriction on contact time.

II Assurances continued

8 Specifications on use of the material continued

b Time and temperature of treatment and storage in contact with the food continued

Packaging Applications – Frozen Food:

■■■■■TM NP films are legal for use in packaging applications where contact with food takes place under frozen conditions ($<0^{\circ}\text{C}$).

For such applications, the applicable legislation does not lay down any restriction on contact time.

NOTE:

■■■■■ has not evaluated the performance of ■■■■■TM NP at low temperatures ($\leq 0^{\circ}\text{C}$).

■■■■■ advises that ■■■■■TM NP may not be technologically suitable for use in packaging applications that would involve processing, treatment or storage at temperatures below -30°C .

Exposure to temperatures below -30°C could result in embrittlement of the films, leading to the formation of fragments which could detrimentally affect the functionality of the packaging unit and cause spoilage of the food product due to physical contamination. This could also occur if the films are subjected to rapid cooling (for instance, during processes such as blast freezing, snap freezing or flash freezing).

Encasement Applications:

■■■■■TM NP films can be used for the fabrication of articles intended to hold portions of meat, cheese or similar foods during cooking or similar culinary processes that are carried out at elevated temperatures ("encasement applications").

■■■■■ confirms that in such applications ■■■■■TM NP films may legally be used for the holding of food during culinary processing operations carried out in the temperature range from 0 to $+100^{\circ}\text{C}$.

For these applications, the applicable legislation does not lay down any restriction on contact time.

c The highest food contact surface area to volume ratio for which compliance has been verified.

30.00 dm² of contact surface per kg of food

This is the highest surface area to volume (S/V) ratio for which ■■■■■ offers a general assurance of compliance for the full range of food types and time-temperature conditions described in sections 8a & 8b.

d Contact geometry.

■■■■■ has developed ■■■■■TM NP for applications in which either:-

- one surface of the film makes contact with food; or
- both surfaces of the film make contact with food.

For single-surface contact applications there is no restriction on which surface is placed in contact with food as the two surfaces are nominally identical.

II Assurances continued

9 Functional barrier:

■■■■■ does not offer an assurance that ■■■■■™ NP would perform as a functional barrier to the migration of individual substances in any specific packaging structure or for any specific food contact application.

The verification of functional barrier characteristics is not presently included as part of the ■■■■■ quality assurance testing protocols for the subject films.

For producers of multi-component packaging articles, it is the responsibility of the producer of the final article to determine whether a suitable functional barrier exists, taking into account:

- the identities of the potentially migrating substances for which the existence of a functional barrier is to be demonstrated;
- the physical and chemical characteristics of the various components from which the article is formed, and the spatial relationship of those components;
- the nature of the food with which the packaging article is to be placed in contact;
- the times and temperatures relevant to the period for which the packaging article is to be in contact with the food during treatment and storage.

III Business Operator Commitment to Cooperate with Food Control Authorities (Competent Authorities/Enforcement Authorities)

Addressed to downstream business operators in EEA States (EU-27 + NO/IS/LI) & the United Kingdom and stated in respect of Article 16(1) of the Framework Regulation (EC) No 1935/2004.

■■■■■ undertakes to make available to the food control authorities any supporting documentation that they may reasonably require, to demonstrate that ■■■■■™ NP complies with the applicable legal requirements.

NOTE:

Croatia completed negotiations for its accession to the EEA in November 2013.

Since 12 April 2014 Croatia is provisionally applying the EEA Agreement pending the ratification of its accession by all EEA contracting states.

As of December 2024 the 'Agreement on the participation of the Republic of Croatia in the European Economic Area' had been ratified by 30 out of 31 parties.

This is the most recent information available on ratification status at the present date.

IV Other Provisions

This declaration applies to [REDACTED]™ NP as placed on the market by [REDACTED]

It remains the responsibility of the food packer to verify the suitability of the final material or article for the proposed food contact application, including:

- checking that the physical properties of the final material or article make it suitable for the proposed application;
- verifying compliance of the final material or article with any applicable migration limits;
- checking for the possible influence of the final material or article on the composition and organoleptic properties of the contacted food.

As a precautionary measure to ensure food safety, [REDACTED] recommends that customers should discard the outermost and innermost circumferential turns of film on each slit reel/trimmed mill roll during their subsequent conversion or use.

[REDACTED]™ is a registered trademark of the [REDACTED] Group in many countries.

This declaration is issued subject to the [REDACTED] governing the applicable sales contract which are incorporated by reference.

No guarantee or warranty is provided that any of the subject films is adapted to the client's specific use.

It is the client's responsibility to perform their own evaluations to determine suitability for their own contemplated application.

The final decision on use of a film product remains the sole responsibility of the client.

V Author, Place, Date & Reference

This declaration was prepared by: [REDACTED] Regulatory Affairs Specialist	Signature: [REDACTED]
Place of issue: Date of issue:	[REDACTED] 23 December 2024

Full Document Reference – for [REDACTED] use only:

[REDACTED]
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(end)

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