

DECLARATION OF CONFORMITY, EUROPE

Product description

VELLUM-FSC / PERM.GREENTAC +

Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

Food contact regulations

We hereby confirm that the above mentioned product is in compliance with the EC regulations

REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, (hereinafter referred to as "Regulation (EC) No 1935/2004").

COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, amended up to COMMISSION REGULATION (EC) No 282/2008 of 27 March 2008, (hereinafter referred to as "Regulation (EC) No 2023/2006").

All UPM Raflatac manufacturing sites in Europe have food safety system according to ISO 22000.

Substances with limits and restrictions as listed in Regulation (EU) No 10/2011

Limits and restrictions as listed in Regulation (EU) No 10/2011, Annex I

Substance name	Substance identification	Restrictions
<i>formaldehyde</i>	FCM: 98 CAS: 0000050-00-0	SML:(1) 15 mg/kg SML(T) Remark:(1) Group 15: expressed as formaldehyde (98, 196, 344)
<i>acrylic acid</i>	FCM: 147 CAS: 0000079-10-7	SML:(1) 6 mg/kg SML(T) Remark:(1) Group 22: expressed as acrylic acid (70, 147, 176, 218, 323, 325, 365, 371, 380, 425, 446, 448, 456, 636)
<i>methacrylic acid, methyl ester</i>	FCM: 156 CAS: 0000080-62-6	SML:(1) 6 mg/kg SML(T) Remark:(1) Group 23: expressed as methacrylic acid (150, 156, 181, 183, 184, 355, 370, 374, 439, 440, 447, 457, 482)
<i>4,4'-thiobis(6-tert-butyl-3-methylphenol)</i>	FCM: 178 CAS: 0000096-69-5	SML:(1) 0,48 mg/kg
<i>acrylic acid, 2-ethylhexyl ester</i>	FCM: 206 CAS: 0000103-11-7	SML:(1) 0,05 mg/kg
<i>acetic acid, vinyl ester</i>	FCM: 231 CAS: 0000108-05-4	SML:(1) 12 mg/kg

DECLARATION OF CONFORMITY, EUROPE
Product description
VELLUM-FSC / PERM.GREENTAC +
Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

<i>phthalic acid, diallyl ester</i>	FCM: 316 CAS: 0000131-17-9	SML:(1) 0,01 mg/kg SML(T) Remark:(1) Annex I. SML= ND. Unless specific detection limits have been set for particular substances or groups of substances, a detection limit of 0,01 mg/kg shall apply
<i>acrylic acid, ethyl ester</i>	FCM: 323 CAS: 0000140-88-5	SML:(1) 6 mg/kg SML(T) Remark:(1) Group 22: expressed as acrylic acid (70, 147, 176, 218, 323, 325, 365, 371, 380, 425, 446, 448, 456, 636)
<i>acrylic acid, n-butyl ester</i>	FCM: 325 CAS: 0000141-32-2	SML:(1) 6 mg/kg SML(T) Remark:(1) Group 22: expressed as acrylic acid (70, 147, 176, 218, 323, 325, 365, 371, 380, 425, 446, 448, 456, 636)
<i>acrylic acid, monoester with ethyleneglycol</i>	FCM: 371 CAS: 0000818-61-1	SML:(1) 6 mg/kg SML(T) Remark:(1) Group 22: expressed as acrylic acid (70, 147, 176, 218, 323, 325, 365, 371, 380, 425, 446, 448, 456, 636)
<i>acrylic acid, 2-hydroxypropyl ester</i>	FCM: 385 CAS: 0000999-61-1	SML:(1) 0,05 mg/kg SML(T) Remark:(1) Annex I. SML expressed as the sum of acrylic acid, 2-hydroxypropyl ester and acrylic acid, 2-hydroxyisopropyl ester. Notes: Note number (1): Verification of compliance by residual content per food contact surface area (QMA) pending the availability of an analytical method. Other Specifications: It may contain up to 25 % (m/m) of acrylic acid, 2-hydroxyisopropyl ester (CAS No 0002918-23-2). SML expressed as the sum of acrylic acid, 2-hydroxypropyl ester and acrylic acid, 2-hydroxyisopropyl ester.
<i>2-methyl-4-isothiazolin-3-one</i>	FCM: 451 CAS: 0002682-20-4	SML:(1) 0,5 mg/kg Other Specifications: Only to be used in aqueous polymer dispersions and emulsions
<i>water</i>	FCM: 515 CAS: 0007732-18-5	No Other Specifications: In compliance with Directive 98/83/EC
<i>polydimethylsiloxane (Mw > 6800 Da)</i>	FCM: 575 CAS: 0063148-62-9	No Other Specifications: Viscosity at 25 °C not less than 100 cSt (100 × 10 ⁻⁶ m ² /s)

DECLARATION OF CONFORMITY, EUROPE
Product description
VELLUM-FSC / PERM.GREENTAC +
Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

<i>polyethyleneglycol tridecyl ether phosphate</i>	FCM: 578 CAS: 0009046-01-9	SML:(1) 5 mg/kg Other Specifications:For materials and articles intended for contact with aqueous foods only.Polyethyleneglycol (EO = 11) tridecyl ether phosphate (mono-and dialkyl ester) with a maximum 10 % content of polyethyleneglycol (EO = 11) tridecylether.
<i>dodecylbenzenesulphonic acid</i>	FCM: 658 CAS: 0027176-87-0	SML:(1) 30 mg/kg
<i>triethanolamine</i>	FCM: 793 CAS: 0000102-71-6	SML:(1) 0,05 mg/kg SML(T) Remark:(1) Annex I. SML expressed as the sum of triethanolamine and the hydrochloride adduct expressed as triethanolamine.Other Specifications:SML expressed as the sum of triethanolamine and the hydrochloride adduct expressed as triethanolamine
<i>polyethyleneglycol (EO = 1-50) ethers of linear and branched primary (C8-C22) alcohols</i>	FCM: 799 CAS: —	SML:(1) 1,8 mg/kg Other Specifications:In compliance with the maximum ethylene oxide content as laid down in the purity criteria for food additives in Commission Regulation (EU) No 231/2012.
<i>sulphosuccinic acid alkyl (C4-C20) or cyclohexyl diesters, salts</i>	FCM: 813 CAS: —	SML:(1) 5 mg/kg
<i>sulphosuccinic acid monoalkyl (C10-C16) polyethyleneglycol esters, salts</i>	FCM: 814 CAS: —	SML:(1) 2 mg/kg

* Substances marked with a single asterisk in this document are reportable substances with variable concentrations due to variations in supply source.

DECLARATION OF CONFORMITY, EUROPE**Product description****VELLUM-FSC / PERM.GREENTAC +****Sales Code: CKG/SP34**

Use: Paper and adhesive, a pressure-sensitive label.

Limits and restrictions as listed in Regulation (EU) No 10/2011, Annex II, Metals

Name / Element	Restriction
Iron (Fe)	SML:(1) 48 mg/kg

Dual use additives

A substance is defined as a "Dual Use Additive" if the chemical identity of the plastic additive matches that of an authorized food additive or flavoring, regardless of its purity or whether or not the substance is subject to a restriction in food and/or in the plastic. In the case of salts it is the salt that matters, not the authorized acid, phenol or alcohol.

The following dual use substances may be present:

Name	Number (E or FL)
Sodium acetates	E 262
Erythorbic acid	E 315
Sodium carbonates	E 500
Ammonium hydroxide	E 527
Dimethyl polysiloxane	E 900
Potassium hydroxide	E 525
Sodium nitrate	E 251
Dibutyl ether	FL 3.021
Methyl methacrylate	FL 9.647

The purity of the Dual Use Additives used in this Product respect the purity criteria set out in Annex I of Regulation (EU) No 10/2011.

DECLARATION OF CONFORMITY, EUROPE

Product description

VELLUM-FSC / PERM.GREENTAC +

Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

Member State legislation and non-European legislation

Intentionally added substances not subject to listing in Annex I according to Article 6 of Regulation (EU) No 10/2011, and other components made from non-plastic materials, are either risk assessed in accordance with Article 3 of Regulation (EC) No 1935/2004 or comply with the requirements of the legislation listed below.

Legislation for countries outside the EU

DECLARATION OF CONFORMITY, EUROPE

Product description

VELLUM-FSC / PERM.GREENTAC +

Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

Determination of the overall migration

Please note that face and adhesive have been assessed individually.

Determination of the overall migration for the adhesive

The determination was carried out according to the methods for the “Examination of consumer goods” corresponding to the directives B 80.30, 1 to 3 (EG) of the Official Collection of Analytical Methods according to § 64 LFGB and according to the rules of the series of standards EN 1186, EN 13130 and CEN/TS 14234 as well as 14235 “Materials and articles in contact with foodstuffs – Plastics or polymer coatings, respectively”.

Simulants
- D1 - Ethanol 50% (v/v) : 11,0 mg/dm ²

Test conditions	Intended food contact conditions
See exception note Test time: 24 hours Test temperature: 40°C	Exception - see exception note

EXCP¹: If it is found that carrying out the tests under the contact conditions specified in Table 3 causes physical or other changes in the test specimen which do not occur under worst foreseeable conditions of use of the material or article under examination, the migration tests shall be carried out under the worst foreseeable conditions of use in which these physical or other changes do not take place.

EXCP²: If it is found that carrying out the tests under the combination of contact conditions specified in Tables 1 and 2 causes physical or other changes in the test specimen which do not occur under worst foreseeable conditions of use of the material or article under examination, the migration tests shall be carried out under the worst foreseeable conditions of use in which these physical or other changes do not take place.

Determination of the overall migration for the paper

Simulants and test conditions
Test conditions and simulants for overall migration of the face paper were not allocated by our supplier. Therefore it remains the responsibility of the converter to verify that the finished article meets the technical and regulatory requirements of the intended application.

DECLARATION OF CONFORMITY, EUROPE

Product description

VELLUM-FSC / PERM.GREENTAC +

Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

Specifications on the use of the material

According to our supplier the face paper is suitable for direct contact with dry and non-fatty foodstuffs.

According to the migration tests performed by an accredited laboratory (EN ISO 17025), the adhesive may be used safely for the reverse coating of the labels for storage at room temperature. The adhesive layer may stand in direct contact with dry and moist, non-fatty foodstuffs according to regulation (EU) 10/2011 up to the amendment Regulation (EU) No 2017/752 of 28 April 2017. The maximum contact area in direct labelling of foodstuff is 2 dm²/1 kg food.

Furthermore, the product may be used in labelling food packaging materials for storage at room temperature or below. The maximum contact area in laminating application is 6 dm²/1 kg food. The relevant migration limits have to be ensured individually.

Please note the specification of use (SoU) in this statement is only for the semi-finished product. This is typically used as a component of a multi layered packaging system and that further processing and converting of this material is carried out. If the SoU is listed separately for each layer and they are different, then the layer with the worst-case specification of use must be taken into consideration. The downstream users must make their own assessment so that they can produce their own food contact statements taking into account the inks and the printing process and other layers to ensure that the relevant migration limits are met for the packaging system as a whole and that through all stages of the manufacturing process the requirements of Good Manufacturing Practice (GMP) according to Regulation (EC) No 2023/2006 are met.

Organoleptic properties

We have not determined whether a material or final article that is produced with this Product will induce an unacceptable change in the composition of the food or will cause deterioration of the organoleptic properties of the food. It is the responsibility of the downstream user to perform these tests.

DECLARATION OF CONFORMITY, EUROPE

Product description

VELLUM-FSC / PERM.GREENTAC +

Sales Code: CKG/SP34

Use: Paper and adhesive, a pressure-sensitive label.

In view of many factors that may affect processing and application of our product, this does not relieve processors from carrying out their own investigations and tests. This declaration is valid for the production from our sites after the date above for 3 years or when new scientific evidence is available, or when substantial changes in production occur and/or until the next relevant legislative or regulatory change comes into force, whichever is sooner.

*DL = Detection limit of the method of analysis

ND = Not detectable

QM = Maximum permitted quantity of the residual substance in the material or article

QM(T) = Maximum permitted quantity of the residual substance in the material or article expressed as mg of total of moiety or substance(s) based on 6 dm² of the surface in contact with foodstuffs

QMA = Maximum permitted quantity of the 'residual' substance in the finished material or article based on 6 dm² of the surface in contact with foodstuffs

QMA(T) = Maximum permitted quantity of the residual substance in the finished material or article expressed as mg of total of moiety or substance(s) based on 6 dm² of the surface in contact with foodstuffs.

SML = Specific migration limit in food or in food simulant

SML(T) = Specific migration limit in food or in food simulant expressed as total of moiety or substance(s) indicated

Disclaimer

This information is based on our most up-to-date knowledge and experience, but this statement does not constitute any warranty, expressed or implied. Information is only intended for the Raflatac customer and cannot therefore be transferred to any third party. We cannot assume any liability for using our products in conjunction with other materials and the customer must make their own qualification and suitability testing before using Raflatac material as part of the customer products. The suitability of Raflatac material in customer products is solely the customer's responsibility.

All our products are sold subject to UPM Raflatac's general conditions, available at www.upmraflatac.com and upon request where our liability towards customer is exclusively defined therein.

In case of any discrepancies, the English version of this document shall prevail.