

**DECLARATION OF CONFORMITY, EUROPE**

**Product description**

**TH LINERLESS TPFREE-FSC / RL1F**

**Sales Code: FWK/RL1F**

Use: Silicone coated 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>petroleum hydrocarbon resins (hydrogenated)</i>	FCM: 97 CAS: —	No Petroleum hydrocarbon resins, hydrogenated are produced by the catalytic or thermal polymerisation of dienes and olefins of the aliphatic, alicyclic and/or monobenzenoidarylalkene types from distillates of cracked petroleum stocks with a boiling range not greater than 220 °C, as well as the pure monomers found in these distillation streams, subsequently followed by distillation, hydrogenation and additional processing. Properties: Viscosity at 120 °C: > 3 Pa.s, Softening point: > 95 °C as determined by ASTM Method E 28-67, Bromine number: < 40 (ASTM D1159), The colour of a 50 % solution in toluene < 11 on the Gardner scale, Residual aromatic monomer = 50 ppm,
<i>butadiene</i>	FCM: 223 CAS: 0000106-99-0	SML = ND QM: 1 ppm 1 mg/kg in final product

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<i>octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate</i>	FCM: 433 CAS: 0002082-79-3	SML: 6 mg/kg -
<i>polydimethylsiloxane (Mw &gt; 6800 Da)</i>	FCM: 575 CAS: 0063148-62-9	No Viscosity at 25 °C not less than 100 cSt (100 × 10 <sup>-6</sup> m <sup>2</sup> /s)

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

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**Group restrictions: Annex I**

No group restrictions are present.

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

Name / Element	Restriction
Lithium (Li)	0,6 mg/kg food or food simulant.

**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)
Fatty acids	E 570

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.

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### 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.

#### National legislation in EU Member States

Material group	Country	Legislation
SILICONES	France	Arrêté du 25 novembre 1992 relatif aux matériaux et objets en élastomères de silicone mis ou destinés à être mis au contact des denrées, produits et boissons alimentaires. <u>Specification of use</u> n/a
	Germany	BfR Recommendations XV. Silicones <u>Specification of use</u> n/a
PAPER AND BOARD	Germany - BfR XXXVI	BfR Recommendations XXXVI. Paper and board for food contact. <u>Specification of use</u> n/a
	Germany - BfR XXXVI/2	BfR Recommendations XXXVI/2. Paper and Paperboard for Baking Purposes. <u>Specification of use</u> n/a

#### Legislation for countries outside the EU

Material group	Country	Legislation
ADHESIVES	United States	TITLE 21--FOOD AND DRUGS CHAPTER I--FOOD AND DRUG ADMINISTRATION DEPARTMENT OF HEALTH AND HUMAN SERVICES SUBCHAPTER B--FOOD FOR HUMAN CONSUMPTION (CONTINUED) PART 175: INDIRECT FOOD ADDITIVES: ADHESIVES AND COMPONENTS OF COATINGS § 175.105 - Adhesives  <u>Specification of use</u> Subject to restrictions in (a)(2). Note that § 21 CFR 175.105 (a)(2) states that for a complying adhesive: The adhesive is either separated from the food by a functional barrier or used subject to the following additional limitations: In dry foods. The quantity of adhesive that contacts packaged dry food shall not exceed the limits of good manufacturing practice. In fatty and aqueous foods. (a) The quantity of adhesive that contacts packaged fatty and aqueous foods shall not exceed the trace amount at seams and at the edge exposure between packaging laminates that may occur within the limits of good manufacturing practice.

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### Determination of the overall migration

Please note that face, top coating 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) : 12 mg/dm <sup>2</sup>

Test conditions	Intended food contact conditions
24 h 40°C	See exception note <sup>1</sup>

EXCP<sup>1</sup>: 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.

EXCP<sup>2</sup>: 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 and top coating

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

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### Specifications on the use of the material

According to migration tests performed by an accredited laboratory (EN ISO 17025), the product may be safely used in food packaging. It is suitable for direct contact with foodstuffs which are known to be peeled, shelled or washed before consumption.

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, moist and such kind of fatty foodstuffs to which the food simulant D1 is assigned (e.g. dairy products) according to the regulation (EU) 10/2011 up to the amendment Regulation (EU) 2016/1416 of 24 August 2016. The maximum contact area in direct labelling of food stuffs is 2dm<sup>2</sup> /1kg food.

According to the migration tests performed by an accredited laboratory (EN ISO 17025), the top coating may be safely used for coating plastic film grades and papers intended for labelling of foodstuffs. The film grades and papers manufactured with the coating may stand in direct contact with dry, aqueous and fatty foodstuffs as far as the top coating is concerned.

Furthermore, the adhesive may be used in labelling food packaging materials for storage at room temperature or below. The maximum contact area in laminating application is 6 dm<sup>2</sup>/1 kg food.

### 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.

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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 dm<sup>2</sup> of the surface in contact with foodstuffs

QMA = Maximum permitted quantity of the 'residual' substance in the finished material or article based on 6 dm<sup>2</sup> 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 dm<sup>2</sup> 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](http://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.