

Declaration of Compliance for food packaging materials

Regulation (EC) No 1935/2004 requires that materials and articles which are intended to be brought into contact with foodstuffs, must not transfer any components to the packed foodstuff in quantities which could endanger human health, or bring about an unacceptable change in the composition or deterioration in organoleptic properties. This means that the manufacturer of the packaging material and the filler have the legal responsibility to ensure that the food packaging is fit for its intended purpose.

Manufacturer and authorized representative

Conpax Kartonnages B.V.
Linie 13 6678 PK Oosterhout (Gld)
The Netherlands

Product

Article nr.	Description	Material / Composition
90015	Gds 240x160x80mm blanco 4x50st	GC2 cardboard printed and coated on the non-food contact side without PET window

Materials

- Cardboard made of virgin fibers.
- Printing ink, low migration.
- Coating, water-based and food grade.
- Adhesives, water-based and food grade.
- PET window patching, if applicable.

Intended use

The cardboard quality may be used safely for food packaging and may stand in direct contact with dry, aqueous and (non-)fatty foodstuffs at temperatures up to 90 °C for holding and reheating of food.

Compliance with European food contact materials legislation

The materials meet the applicable requirements of the following food contact 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.
- *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.
- *Commission Regulation (EU) No 10/2011* of 14 January 2011 on plastic materials and articles intended to come into contact with food including amendments up to Commission Regulation (EU) 2020/1245 of 2 September 2020 regarding adhesives and PET window. With regard to the amendment by Commission Regulation (EU) 2023/1627 of 10 August 2023, the substance bis (2-ethylhexyl) cyclohexane-1, 4-dicarboxylate ('DEHCH', CAS No 84731-70-4, FCM No 1079) is not being added intentionally at the production of PET window. With regard to the amendment by *Commission Regulation (EU) 2024/3190 of 19 December 2024*, the adhesives and PET window do not contain the substances bisphenol A (BPA) or other bisphenols and bisphenol derivatives.
- *BfR Recommendation XXXVI "Paper and board for food contact"* of the Federal Institute for Risk Assessment, introduced in the 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, and last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024.
- *BfR Recommendation XIV "Polymer dispersions"* of the Federal Institute for Risk Assessment, as of 1 April 2022 regarding adhesives.
- *BfR Recommendation XVII "Polyterephthalic acid diol esters"* of the Federal Institute for Risk Assessment, as of 1 July 2016 regarding PET window.
- Inks and coatings are formulated in accordance with the *EuPIA (European Printing Ink Association) "Exclusion Policy for Printing Inks and Related Products" "Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles"*. All ingredients are listed in the appendix to the *Swiss Consumer Goods Ordinance on Materials and Articles in Contact with Food (SR 817.023.21)*.
- *European Parliament and Council Directive 94/62/EC* of 20 December 1994 on packaging and packaging waste and the latest amendment concerning metals.
- *Regulation (EC) No 1907/2006* of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH). Based on suppliers information, we will ensure that the product meets the requirements of REACH at such level that it does not contain either Substances of Very High Concern (SVHC) in concentrations above 0,1% as defined in REACH article 57 or certain dangerous substances listed in Annex XVII.
- *Dutch Commodities Act Regulation on packaging and consumer goods coming into contact with foodstuffs*, the "Warenwetregeling verpakkingen en gebruiksartikelen", introduced in the Staatscourant 8531 (27 March 2014) and last amended in Staatscourant 11934 (1 July 2022).

Overall Migration Limits (OML)

The Overall Migration Limits (OML) of the PET window are tested and compliant with Commission Regulation (EU) No 10/2011.

Simulant used	Test condition	OML (10/2011)	Result
Simulant A (10% Ethanol)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant B (3% Acetic acid)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant C (20% Ethanol)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant D1 (50% Ethanol)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant D2 (95% Ethanol)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant D2 (Iso Octane)	10 days at 40 °C, 4 hrs at 100 °C	10 mg/dm ²	<5 mg/dm ²
Simulant D2 (rectified olive oil)	10 days at 40 °C, 2 hrs at 175 °C	10 mg/dm ²	<5 mg/dm ²

Specific Migration Limits (SML)

Based on suppliers information, the following substances are used for the production of the mentioned materials, for which a specific migration limit (SML) has been established in Commission Regulation (EU) No 10/2011 and/or Swiss Ordinance SR 817.023.21. In case of intended use, there are no risks that the mentioned SML's will be exceed.

Material	FCM No	CAS nr.	Substance	SML (10/2011)	SML (SR 817.023.21)
Printing ink	10	N/A	Acids, C2-C24 aliphatic, linear, monocarboxylic, synthetic and their mono-, di- and triglycerol esters	60 mg/kg	60 mg/kg
	411	1333-86-4	Carbon black (non-migratory)	60 mg/kg	60 mg/kg
	-	1234986	Pigment Red 57:1 (non-migratory)	-	60 mg/kg
	879	N/A	Acids, fatty (C8-C22) from animal or vegetable fats and oils, esters with linear alcohols, aliphatic, mono-hydric, saturated, primary (C1-C22)	60 mg/kg	60 mg/kg
	410	1332-58-7	Kaolin (non-migratory)	60 mg/kg	60 mg/kg
	741	9007-13-0	Resin acids and rosin acids	60 mg/kg	60 mg/kg
	138	77-90-7	Tri-n-butyl acetyl citrate	60 mg/kg	60 mg/kg
	717	65997-06-0	Rosin, hydrogenated	60 mg/kg	60 mg/kg
	549	9002-88-4	Polyethylene wax	60 mg/kg	60 mg/kg
Coating	-	100-41-4	Ethylbenzene	-	0.6 mg/kg
	9400	102-71-6	Triethanolamin	0.05 mg/kg	0.05 mg/kg
	11500	103-11-7	Acrylic acid, 2-ethylhexyl ester	0.05 mg/kg	0.05 mg/kg

Material	FCM No	CAS nr.	Substance	SML (10/2011)	SML (SR 817.023.21)
	17050	104-76-7	2-Ethyl-1-hexanol	30 mg/kg	30 mg/kg
	-	111-90-0	2-(2-Ethoxyethoxy)ethanol	-	5 mg/kg
	-	14024-63-6	Bis(2,4-pentanedionato)zinc(II)	-	10 µg/kg
	-	142-16-5	Maleic acid, bis(2-ethylhexyl) ester	-	10 µg/kg
	21615 66030	150-76-5	4-Methoxyphenol	-	10 µg/kg
	-	2634-33-5	1,2-Benzisothiazolin-3-one	-	0.5 mg/kg
	66755	2682-20-4	2-Methyl-4-isothiazolin-3-one	0.5 mg/kg	0.5 mg/kg
	77708	-	Polyethyleneglycol (EO = 1 - 50) ethers of linear and branched primary (C8-C22) alcohols	1.8 mg/kg	1.8 mg/kg
	91530	577-11-7	Sulfosuccinic acid Alkyl(C4-C20)-Cyclohexyldiester, Natriumsalt	5 mg/kg	5 mg/kg
	80077	68441-17-8	Polyethylene waxes, oxidised	60 mg/kg	60 mg/kg
	86960	7757-83-7	Sodium sulphite	(T) = 10 mg/kg	(T) = 10 mg/kg
	10690	79-10-7	Acrylic acid	(T) = 6 mg/kg	(T) = 6 mg/kg
	-	9003-13-8	Poly[oxy(methyl-1,2-ethanediyl)], α-butyl-ω-hydroxy-	-	10 µg/kg
	-	9003-53-6	Benzene, ethenyl-, homopolymer	-	10 µg/kg
	-	9011-14-7	Acrylic acid, 2-methyl-, methyl ester, homopolymer	-	10 µg/kg
	-	98-82-8	Isopropylbenzene	-	10 µg/kg
	22210	98-83-9	α-methylstyrene	0.05	0.05 mg/kg
Adhesive	231	108-05-4	Vinyl Acetate	12 mg/kg	-
PET window	227	107-21-1	Ethylene Glycol	30 mg/kg	-
	263	111-46-6	Di-Ethylene Glycol	30 mg/kg	-
	291	121-91-5	Iso-phthalic acid	5 mg/kg	-
	785	100-21-0	Terephthalic acid	7.5 mg/kg	-
	398	01309-64-4	Total Antimony (As antimony trioxide)	0.04 mg/kg	-
	128	75-07-0	Acetaldehyde	6 mg/kg	-

Dual Use Additives

Based on suppliers information, the product may contain substances which are recognized as Dual Use Additives in the Regulation (EC) No 1333/2008 and Regulation (EC) No 1334/2008 of the European Parliament and of the Council of 16 December 2008 on food additives respectively flavourings and food ingredients with flavouring properties.

Material	E number	Substance	Material	E number	Substance
Board	E170	Calcium carbonate	Printing ink	E180	Pigment Red 57:1 (non-migratory)
	E251	Sodium nitrate		E559	Kaolin (non-migratory)
	E262	Sodium acetate		9.511	Tri-n-butyl acetyl citrate
	E296	Malic acid	Coating	E221	Sodium sulphite
	E330	Citric acid		E260	Acetic acid
	E321	Butylated hydroxytoluene		E422	Glycerol (only matt coating)
	E355	Adipic acid		E527	Ammonia
	E415	Xanthan gum		E551	Silicon dioxide (only matt coating)
	E460	Cellulose		E900	Dimethyl polysiloxane
	E491	Sorbitan monostearate		E914	Oxidised Polyethylene wax
	E493	Sorbitan monolaurate		E1520	Propane-1, 2-diol (propylene glycol)
	E511	Magnesium chloride			
	E513	Sulphuric acid			
	E514	Sodium sulphate			
	E517	Ammonium sulphate			
	E520	Aluminium sulphate			
	E524	Hydroxides			
	E551	Silicon dioxide			
	E553a	Magnesium silicate			
	E553b	Talc			
	E559	Clay			
	E905	Microcrystalline wax			
	E1521	Polyethylene glycol			
	FCM 564	Starch			
	FL No 05.149	Glutaral			
	FL 09.037	Ethyl acrylate			

RATIO OF FOOD CONTACT SURFACE AREA TO VOLUME USED

No supplier information available about the surface to food-contact ratio.

PFAS

Based on suppliers information we can confirm that no per- and polyfluoralkyl substances (PFAS) has been used for the production or has been intentionally added during the manufacturing process chain of the products, listed above. PFAS as a group of more than 4.700 chemicals, are known to be highly persistent in the environment. These components may be present at background trace levels due to secondary contamination, which has not been assessed by us.

MOSH/MOAH

For GC2 cardboard qualities 100% virgin fibres are used. Printing inks are vegetable based and mineral oil free. Our suppliers state that during the manufacturing processes no mineral oil as such is intentionally added. Very small traces of mineral oil hydrocarbons may be present as impurities, but well below the limits prescribed by the French Decree No. 2020-1725. Our Position Statement on MOSH/MOAH for food packaging materials is available upon request.

Traceability

Traceability is guaranteed in compliance with Regulation (EC) No 1935/2004 by using a unique production order number.

Good Manufacturing Practice

The Good Manufacturing Practices system in accordance with the certified FSSC 22000 standard meets the requirements defined in Commission Regulation (EC) No 2023/2006.

Disclaimer

This document is not valid in case of unintended use of the product(s) listed above, that can lead to changes of the composition and organoleptic properties of the packed foodstuff. It is the sole responsibility of the user of the product(s) to check the specific interaction between the product and packed foodstuff.

This document is based on the information provided by our suppliers and/or the material analyses by external laboratories. This information is accurate to our current knowledge. Compax Kartonnages B.V. does not assume any liability for the correctness of these statements and analyses.

This document is based on current European legislation. It is valid from the issued date until the legislation have been significantly changed. We recommend our customers to verify the regulatory status periodically. This document supersedes all previous declarations of compliance in relation to these products.

Oosterhout (Gld), 14-05-2025

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