

Declaration of Compliance: Direct Food Contact Use

Information of the product

Selling name and identification data of the packaging material

Corrugated board box with plastic window film for bakery products.

Structure of the packaging material

The packaging material consists of white corrugated board and OPP window film. The product is produced to needed size and can be printed. The inner surface of corrugated board and plastic film are designed to be in direct contact with food. Adhesives and printing ink meet the needs of indirect food contact use.

Intended use of the packaging material

The packaging material is suitable for bakery products in general. Corrugated board and OPP window film is safe to use with dry and non-fatty products as well as moist and fatty foodstuffs in any long-term applications in room temperatures and below. When packing aqueous and fatty foodstuffs we recommend a functional barrier between the food and the board although a direct contact is allowed. Customers should verify the suitability of the product for its specific end use. Not applicable holding food during cooking.

Handling and storage

Keep away from all sources of ignition when handling, transferring and processing the product. Keep in a cool, dry, well ventilated place. Keep away from moisture.

Products have to be protected from direct UV-light. To maintain original dimensions of the carton the storing conditions should be 45-55 % relative humidity and temperature between +15 to 30°C. Improper storage can initiate degradation, which results in odor generation and colour changes and can have negative effects on physical properties of the products. Avoid sudden changes in temperature and acclimate to operating room temperature before use. We recommend using products within 12 months from manufacturing date.

Analysis of the suitability of the raw materials for food contact use

(Based on declarations sent by producers)

Raw materials comply with the following regulations in force in Finland and other countries:

Pyroll Pakkaukset / Pyroll Packages

PYROLL LAHTI
Takon Kotelotehdas Oy
Lahden tehdas
Sorvarinkatu 13
FI-15700 Lahti
Tel. +358 (0)30 624 2310
Fax +358 (0)30 624 2360

Kotipaikka / Municipality: Tampere
ALV-numero / VAT Number: FI01548131

Verkkolaskut / Electronic invoices: OVT / EDI 003701548131
Operaattori / Operator: Itella Information Oy
Välittäjä-tunnus / Operator address: 003710948874
Paperilaskut / Paper invoices: PL 20230, FI-00021 Laskutus

Corrugated board:

- The European Parliament and the Council of the European Union Regulation (EC) 1935/2004
- Commission Regulation (EC) 2023/2006
- EU Res AP(2002) 1

OPP window film:

- The European Parliament and the Council of the European Union Regulation (EC) 1935/2004
- Commission Regulation 10/2011
- Commission Regulation 2023/2006

Following substances can be present which are subjected to SML:

| Compound | PM/Pref | Cas No | SML |
|---------------------------|---------|-------------|----------------------------|
| Slip Agent | 68400 | 010094-45-8 | 5 mg/kg |
| Antioxidant | 38820 | 026741-53-7 | 0,6mg/kg |
| Antistat –Ethox.amine | 39090 | — | 1,2 mg/kg |
| Stearic acid, (zinc salt) | 89040 | 000057-11-4 | 25 mg/kg (expressed as Zn) |
| Vinylidene fluoride | 26140 | 000075-38-7 | 5mg/kg |
| Tetrafluoroethylene | 25120 | 000116-14-3 | 0,05 mg/kg |
| Hexafluoropropylene | 18430 | 000116-15-4 | 0,01 mg/kg |

Plastic material provider’s calculations show, that SMLs will not be exceeded in these films.

Following dual use -substance can be present in the film:

| Chemical name/nature | Dual-use |
|-----------------------------------|------------|
| Mono-/diglycerides of fatty acids | <u>yes</u> |
| Stearic acid,(zinc salt) | <u>yes</u> |
| Glyceryl monostearate | <u>yes</u> |

Adhesive:

- FDA 21 CFR § 175.105, “Indirect food additives: adhesives”

Printing ink

- The European Parliament and the Council of the European Union Regulation (EC) 1935/2004
- Commission Regulation (EC) 2023/2006
- EC Regulation 10/2011/EC

The product is developed to use in places where ink do not come in direct contact with food so normal packaging legislation is not applicable and there is no specific EU legislation on printing inks.

The product is manufactured using GMP-principles and the raw materials are selected according to EuPIA (European Printing Ink Association) exclusion list draft.

There are no substances, which are on the exclusion lists of SBPIM (Society of British Printing Ink Manufacturers) and VdD (Verbund der Druckfabenindustrie / German Association of Printing Ink Manufacturers) used as raw materials in the inks. Azo dyes and phthalate esters are not used.

Pigments are not based on heavy metals; they meet the purity requirements of the CoE Resolution AP(89)1 or the BfR Recommendation IX with regard to heavy metal contaminants. According to the statements of the suppliers of the raw materials, the pigments meet the requirements concerning heavy metal impurities of the EC Directive 94/62/EC and the US Regulations of CONEG.

Following compounds can be present in printing inks which are subjected to SML or dual use:

| CAS No. | PM/Ref No. | FCM No. | Name | Restrictions and specific migration limits (SML) [mg/kg] | | Regulation (EC) No 1333/2008 | For non-volatile/non-reactive substances: Maximum amount in dried ink film [%] | WCC, S/V ratio 6:1 [mg/kg] | Comment |
|------------|-------------|---------|--|--|---|------------------------------|--|----------------------------|---------|
| | | | | Regulation (EU) No 10/2011 | Swiss Ordinance 817.023.21 [either "SML" or "part B"] | | | | |
| 57-55-6 | 23740/81840 | 109 | 1,2-Propylene glycol | (60) | (60) | E 1520 | 5,0 | 9,1 | |
| 68441-17-8 | 80077 | 811 | Polyethylene waxes, oxidized | 60 | 60 | E914 | 2 | 3,6 | |
| 68439-50-9 | 77708 | 799 | Polyethyleneglycol (EO=1-50) ethers of primary linear and branched C8-C22 alcohols | 1,8 | 1,8 | - | 0,40 | 0,7 | |
| 68131-40-8 | 77708 | 799 | Polyethyleneglycol (EO=1-50) ethers of primary linear and branched C8-C22 alcohols | 1,8 | 1,8 | - | 0,05 | 0,09 | |
| 84133-50-6 | 77708 | 799 | Polyethyleneglycol (EO=1-50) ethers of primary linear and branched C8-C22 alcohols | 1,8 | 1,8 | - | 0,05 | 0,09 | |
| 104-76-7 | 17050 | 209 | 2-Ethylhexan-1-ol | 30 | 30 | - | 0,02 | 0,04 | |
| 8001-79-4 | 54450 | 36 | Fats and oils, from animal or vegetable food sources | (60) | (60) | - | < 0,01 | 0,01 | |

| | | | | | | | | | |
|-----------|-----------------|-----|---|------|------|-------|--------|--------|---|
| 2634-33-5 | 37520 | | 1,2-Benzisothiazol-3(2H)-one | 0,5 | 1,2 | - | 0,01 | 0,02 | |
| 2682-20-4 | 66755 | 451 | 2-Methyl-2H-isothiazol-3-one | 0,5 | 0,5 | - | < 0,01 | 0,01 | See annex 1, list III.12 (Swiss Ordinance) |
| 9003-11-6 | 79920 | 551 | 1,2-Propyleneglycol, ethoxylated and propoxylated | (60) | (60) | - | 0,7 | 1,9 | |
| 108-01-0 | 16150 | 230 | 2-(Dimethylamino)ethanol | 18 | 18 | - | 0,12 | 0,22 | |
| 141-43-5 | 12763/35 170 | 326 | 2-Aminoethanol | 0,05 | 0,05 | - | 0,08 | 0,15 | Exemplary analyses indicate that printed substrates can fall below this limit |
| 1310-73-2 | 86720 | 400 | Sodium hydroxide | (60) | (60) | E 524 | < 0,01 | < 0,01 | |
| 128-37-0 | 46640 | 315 | 2,6-Di-tert.-butyl-p-cresol | 3 | 3 | E 321 | < 0,01 | < 0,01 | |
| 1310-58-3 | 81600 | 399 | Potassium hydroxide | (60) | (60) | E 525 | 0,04 | 0,08 | |

Legislation, chemical legislation, environment and traceability

EU Legislation and traceability

The product fulfills the frame regulation 1935/2004 for food contact materials. Also regulation 2023/2006 is followed. Local public authorities are monitoring the factories regularly. Products are traceable according to their manufacturing week which can be found from the product label. Factory is ISO 9001, 14001, 22000 and EN15593 certified.

REACH

The product is free of substances of very high concern in regard of 1907/2006/EC, product is in accordance of 94/62/EC as amended.

Waste

The product can be recycled as carton waste (recommended) or used as a source of energy.

This statement is valid until substantial changes in the production bring changes in the migration, when new scientific data are available, or if legislation brings changes in the content of this declaration.

For more information, take contact to your dedicated sales person.