**Food Contact Status Declaration**

Article 16 of Regulation (EC) No 1935/2004 requires a written declaration stating that the materials and articles covered by a specific measure comply with the applicable rules to them. Paper and board packaging does not fall under this requirement.

Committed to food safety and an optimal food safety communication in the supply chain, our company shares herewith adequate information on the food safety status of the delivered cartons in accordance with the template adopted by the ECMA Technical Committee (Version 3 - July 2017).

This template has been developed for all cartons delivered for food applications,

irrespective the presence of barriers between the food and the carton.

**1. General Product Information**

|  |  |
| --- | --- |
| Customer : |  |
| Carton supplier : |  |
| Address supplier : |  |

**Material description**

|  |  |
| --- | --- |
| **Article number** | **Article description** |
|  |  |

**2. Material description (from the outer to the inner layer)**

|  |  |
| --- | --- |
| Varnish : |  |
| Ink : |  |
| Adhesive : |  |
| Window : |  |
| Board : |  |
| Polymeric layer : |  |

**3. Confirmation of the Intended Food Contact**

Our company confirms that the product on this statement complies - to our best knowledge - with the applicable requirements of the EU “Framework” Regulation (EC) no. 1935/2004 on materials and articles intended to come in contact with food and with regulation (EC) no. 2023/2006 on good manufacturing practice for materials and articles intended to come in contact with food.

In common agreement further compliance checks may however be required for the substances specifically mentioned in section 5 of this declaration.

The converting process is in accordance with the ECMA GMP.

This declaration is based on the following shared information covered in the customer food safety checklist :

|  |  |
| --- | --- |
| **Properties of the food**  (consistency, fat content ... chemical properties, surface/volume ratio ) |  |
| **Processing of the packed food**  (temperature ...) |  |
| **Layers and type of barrier in place between the carton and the food**  (presence of a functional barrier ...) |  |
| **Use by the consumer**  (heating, overall maximum storage period ...) |  |

Promotional items, inserts and stickers provided by the customer for integration in the carton require a food safety declaration from the customer.

Promotional items, inserts and stickers integrated at a later stage, as well as the adhesives used by the packer/filler are out of the scope of this declaration and must be evaluated by the end user.

*[In case the packer/filler confirmed the presence of a functional barrier between the carton and the food, there is no need to fill in section 4.]*

**4. Declarations from the raw material suppliers**

**4.1 Board (no specific harmonized EU legislation)**

Type of board used :

0 Virgin fibre

0 Recovered fibre (including partial)

0 Barrier board

0 Other .................................................

The supplier confirmed the used board complies with :

0 BfR Recommendation XXXVI

0 CEPI Industry Guideline

0 Other : …………………………..…….

In case plastic coatings are applied, the supplier confirmed the composition of the plastic layer is compliant with the requirements included in the Plastics Regulation (EU) No 10/2011.

The board supplier declared the board is suitable to come in contact with :

........................................................................................................................................

and the sensoric requirements are fulfilled for the given application

..............................................................................................................................................

*[In case the board supplier confirmed the applied barrier on the reverse side represents a functional barrier, there is no need to fill in the rest of section 4.]*

**4.2 Printing inks (no specific harmonized EU legislation)**

Type of printing ink used :

1. Low migration
2. Mineral oil free (<0,1 %)
3. Conventional
4. UV

0 Other ................................................

The supplier confirmed the printing ink complies with the :

0 Swiss Ordinance 817.023.21

0 EUPIA Guidelines on printing inks applied to the non-food contact surface of

food packaging

0 Other ................................................

The ink supplier declared the ink is suitable for the following use ……………..............

**4.3 Varnishes (no specific harmonized EU legislation)**

Type of varnish :

0 Low migration

0 Mineral oil free (<0,1 %)

0 Conventional

0 UV

0 Other ................................................

The supplier confirmed the used varnish complies with :

0 Plastics Regulation No 10/2011

0 BfR Recommendations XIV (and XLI)

0 Swiss Ordinance 817.023.21

0 Spanish Royal Decree 847/2011

0 FDA 21 175.300

0 EuPIA Guidelines on Printing Inks applied to the nonfood-contact surface of food

Packaging

0 Other …………………………………

The supplier declared the varnish is suitable for the following use ..……............…..

**4.4 Adhesives (no specific harmonized EU legislation)**

Type of adhesive :

0 Dispersion

0 Hotmelt

0 Food grade (low migration)

0 Other ................................................

The supplier confirmed the adhesivecomplies with:

0 BfR Recommendation XXVIII

0 FDA 21 175.105

0 FEICA Guidelines

0 Other ................................................

The supplier declared the adhesive is suitable for …………………............……..

**4.5 Window film**

Type of window film : ................................................

The supplier confirmed the used window film complies with the Plastics Regulation No 10/2011

The supplier declared the window film is suitable for ……………...........…………..

**5. Performed overall risk assessment and required further compliance work**

Based on the information obtained from our suppliers for the different materials used, worst case calculations for the finished carton indicated the following substances with restrictions (Plastics Regulation (EU) No 10/2011, dual use additives, known NIAS, ...) may require a further safety check :

|  |  |
| --- | --- |
| **Substance name** | **CAS No** |
|  |  |
|  |  |
|  |  |
|  |  |

A simulant based (\*) targeted analysis was performed on the finished carton or individual components for the following substances :

|  |  |
| --- | --- |
| **Substance name** | **CAS No** |
|  |  |
|  |  |
|  |  |
|  |  |

(\*) Only the final food customer can test the overall packaging concept with a sample of the packed food.

Our company controls on the sensoric properties of the delivered cartons, are limited to a generic observation of off odour and taint on raw materials deliveries, quality control operations, transport vehicle inspections and the likes as these are described in the pre-requisite programs of hygiene standards (BRC Packaging Issue 5 or equivalent).

The measures taken are not releasing the final food customer from his/her responsibility to perform a sensoric evaluation on its food product.

The present declaration covers the food contact status of the carton packaging when leaving our production facilities.

The further final gluing, storage and transport in the supply chain requires a careful approach to avoid contaminations.

Company entity : ............................................

Date : .....................................

|  |  |
| --- | --- |
| Managing Director | Manager Quality |