

**Declaration of Conformity
with regard to food regulations**

Version 2021/1

1. Declaration

Subject to due observance of the provisions for conditions governing contact with foods (see point 6), the product ranges listed below (see point 2) from our production facility in D-72275 Alpirsbach, Reutiner Strasse 7, Germany, intended for direct contact with foods, all comply in full

with Regulation (EC) No. 1935/2004,

with Regulation (EC) No. 2023/2006,

with Regulation (EU) No.10/2011 and subsequent amendments,

with Sections 30 and 31 of German LFGB legislation and

with the recommendation VII of the Federal Institute for Risk Assessment (BfR)

for all used PP raw material types.

All of the tests required in relation to the above were carried out by an institute accredited in acc. with ISO/IEC 17025:2005 with number D-PL-19570-02-00.

2. Product ranges

EOP, EOC, EOA	DOP, DOC, DOA
ERE, ERC, ERA	DRE, DRC, DRA, SRE, SRR
EQA, EVE, EVK	DQA, DVE, DVK
WVZ	DVZ
BZ	DS, DRG

The aforementioned list of product ranges applies to **all volume stage** and for all colours in neutral, printed or IML design.

3. Test conditions

3.1. Legal conditions

The tests were carried out under the test conditions specified in the Regulation (EU) No. 10/2011 in conjunction with Annex V.

3.2. Simulants

3.2.1. For the OML test, all of the following food simulants

A	Ethanol	10% of volume
B	Acetic acid	3% of weight
D1	Ethanol	50% of volume
D2	Olive oil	rectified

3.2.2. For the SML test, only the most stringent food simulant

Duration and time of the treatment

OML 10 d at 40 C

SML 10 d at 60 C

3.3. Surface to volume ratio

The ratio of the food contacting surface and volume, which was used to representatively determine conformity is 6.0 dm² per litre.

4. Test results

4.1. OML (Overall migrations limit)

The allowed limit has been complied with under the specified test conditions. The maximum values determined for all conducted tests were clearly below 10 mg/dm².

4.2. SML (Specific migration limit)

The restrictions on evaluated substances (Annex I and Annex II) -where these are present in the plastics used- as well as other relevant provisions of the Regulation (EC) no. 10/2011 are complied with under the above mentioned test conditions or cannot be exceeded under the assumption of total migration. However, should any additives used be covered under confidentiality, these shall be fully known to our testing institute.

To the extent that substances evaluated and subject to restrictions are contained in the colour concentrates, the above-mentioned regulations shall also be deemed to have been complied with.

4.3. Dual use additives

Due to their concentration within the material, dual use additives included in the plastics used for our packages do not or only to such minor extent migrate under intended and predictable applications that there is no technical effect in food.

To the extent that dual use substances are included in colour concentrations, these substances do not migrate or, under the assumption of total migration, only migrate to such minor extent that there is no technical effect.

4.4. Sensors

The sensory analysis is performed according to DIN 10955 with tap water. None of the test results has exceeded the meridian value of 1.5 neither as far as the appearance is concerned nor with regard to the odour or the taste. The organoleptic requirements are met.

5. Further explanations

5.1. Production standards

The production series listed under point 2 were produced in accordance with the quality standards ISO 9001:2015 and FSSC 22000.

5.2. Starting substances

Only the starting substances listed in the Regulation (EU) No.10/2011 are used. Recyclates (Regulation (EC) No. 282/2008) are not used.

5.3. Unwanted substances

For the above-stated product series none of the following substances is used for the recipes in any of the production steps.

PVC	PVDC
ATBC	ESBO
Bisphenols (A, F, S)	Benzoles
Ethylenbenzenes	Phthalates
Toluenes	Xylenes
Silicone	Natural rubber
Alkylphenols (e. g. Octyl-, Nonylphenol)	2-Ethyl hexoic acid
Any type of glue	Epoxyderivates (BADGE, NOGE, BFDGE)

Further information required for your purposes, will be submitted upon request 1.

5.4. Print inks

The printing inks and lacquers used are suitable and approved for printing the side of packaging facing away from the foodstuff, i. e. the non-contact side. In terms of their composition and manufacture, they comply with the EuPIA guideline, their recipes involve low migration levels and they contain no mineral oils. In the migration and screening tests of colour components, the set-off effect (set-off of the printed side to the food contact side) has also been taken into account.

In particular, we draw attention to the fact that the printing inks are not intended for direct contact with foodstuffs.

5.5. Colour concentrates used for the colouration of plastics

The used products meet the Resolution AP (89) 1 of the BfR's recommendation IX for colours used to dye plastics and the terms of the Regulation (EC) 94/62 with regard to the limitation of heavy metals.

5.6. NIAS (not intentionally added substances)

Using a detection limit of 0.01 mg/kg, not intentionally added substances do not migrate to food.

5.7. Traceability

The traceability of our products is ensured by the Framework Regulation (EC) No. 1935/2004.

5.8. Conformity of every processing stage

For every substance used and integrated by us into our plastic packaging of the above named product series and for every item of trade goods purchased by us, we ensure that the corresponding declarations of conformity with regard to provisions on foodstuffs have all been obtained.

6. Suitability and application

The complete volume amounts of the aforementioned product series are suitable for dry, aqueous, acidic, alcoholic and oily foods of all types, including milk and dairy products; for pasteurisation or hot filling and heating up to a temperature T ($70\text{ °C} \leq T \leq 100\text{ °C}$), for a maximum of $t = 120/2^{(T-70)/10}$ minutes (OM 2); and for long-time storage conditions at room temperature or lower. The test conditions for OM 2 also include the food contact conditions described for OM 1 and OM 3.

7. Restriction

For special filling materials, the user himself must test a possible use of our plastic packaging exceeding the suitability and conformity determined by us under the terms of the applicable Regulations. The same applies when the user makes changes to the plastic packaging delivered by us, or has changes made that are within his scope of responsibility and which might possibly impact the food law-related serviceability. We cannot be held liable for any damage arising thereof.

8. Validity

This Declaration of Conformity with Food Law applies exclusively to the member states of the EU and to states that have adopted the EU's corresponding legal regulations.

It is not subject to any time restriction, provided there are no changes in legal requirements, materials, product design, test conditions, production conditions or new scientific findings that require an update. Should any of the aforementioned circumstances occur, we will issue an updated declaration of conformity in a timely manner.

9. Disclaimer

This declaration is the result of a thorough evaluation of the conformity assessments by our suppliers at the moment they were submitted to us and of the test reports from the test institute commissioned by us. It is expressly not any written guarantee. Furthermore, it is not possible to deduce any confirmation of the properties and condition of our packaging products for the purposes of article 434 of the German Civil Code (BGB) from this Declaration because our suppliers include a similar reservation. Modifications reserved.

04 January 2021

Tom Saier
Managing Director

This document has been created electronically and is thus valid without signature.

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