eingegangen am 28.03.2025
STAV 651293

VAN DE VELDE PACKAGING
THE FULL PACKAGE IN PACKAGING

Declaration of Compliance

Manufacturer:	Van de Velde Packaging Veerkarton Industrieweg 11, 1566JN Assendelft, Netherlands
Customer:	Bäko Zentrale EG
Product(s):	See Annex

Materials:

☒	Cardboard	GC2 (virgin fiber) [1)]
☒	Printing ink:	low migration ink [2)]
☒	Coating:	water-based, food grade coating
☒	Adhesive:	water-based, food adhesive
☒	Window patching:	A-PET or Bopet [3)]
☒	Laminate film:	PET Gold or PET transparent [4)]
☐	Hot foil:	only on non-food contact side of packaging
☐	UV ink:	only on non-food contact side of packaging

Intended use of the product

The inside of the carton packaging is suitable for long-term contact with dry and greasy food products at a temperature of 0°C to room temperature.

Limitations of use

More information about limitations and/or specific conditions of use is available upon request.

We declare that all applied materials for the manufacturing of mentioned product(s) comply with the legal requirements for cardboard packaging materials intended to come into contact with food.

Compliance with food contact materials legislation in EU

From a regulatory point of view the product is compliant with the following food contact material legislation:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27th October 2004 on materials and articles intended to come into contact with food.
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. All products are manufactured based on Good Manufacturing Practice in accordance with the certified BRCGS Packaging materials Hygiene System (GSFI standard).
- Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food including amendments up to Declaration Date.
- Dutch Law: Dutch Commodities Act (July 2022).
- Belgium Law: Royal Degree on materials and articles intended to come into contact with food.
- German Law: Food and Feed Code Section 5 § 30 and § 31, and BfR XXXVI recommendation on paper and board for food contact.
- Swiss Law: Ordinance on Materials and Articles in Contact with Food (SR 817.023.21).
- French Legislation 2020-105 and 2020-1725

Compliance with non-food contact materials legislation in EU

From a regulatory point of view the product is compliant with the following non-food contact material legislation:

- European Parliament and Council Directive 94/62/EC on packaging and packaging waste.
- Regulation (EC) No 1907/2006 on 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.

Migration

Based on suppliers statements, printing inks are formulated in accordance with the Swiss Ordinance on Materials and Articles in Contact with Food (SR 817.023.21) and comply with the EuPIA (European Printing Ink Association) Guideline on Printing inks Applied to the Non-food Contact Surface of Food Packaging Materials and Articles. Printing inks do not contain heavy metals, Primary Aromatic Amines and other Substances of Very High

Concern (SVHC) with restrictions mentioned in Annex II of the Plastic Regulation (EU) No 10/2011 in amounts exceeding the legal limits. Printing inks are vegetable based and mineral oil free; levels of mineral oil hydrocarbon impurities do not exceed parts per million (ppm) levels.

Therefore, if the printed surface does not come into contact with foodstuff, the overall migration of substances does not exceed the maximum limit of 10 mg/dm^2 (EU-cube; 60 mg/kg) and complies with the mentioned regulations. If the printed surface does come into contact with foodstuffs, this cannot be guaranteed.

Van de Velde Packaging can conduct a migration test and/or worst case calculation upon request at the expense of the customer. If there has been a migration test conducted for the mentioned product(s), the overall migration limit (OML) and/or specific migration limits (SML) in the test report are leading.

Identification and traceability

All products and/or outer packaging include an item number and order number corresponding to all relevant documentation whereby traceability is ensured.

Outsourcing and subcontracting

Outsourced processes e.g. laminating, window patching and hot foil stamping will be done by subcontractors, preferable GFSI certified e.g. BRCGS Packaging materials, under guaranteed conditions of Good Manufacturing Practice.

Additional notes

[1)] Cardboard types based on recycled fibers may contain mineral oils, including MOSH and MOAH. For MOAH, within the EU, the Standing Committee on Plants, Animals, Food and Feed (SC PAFF) has set restrictions for the presence of this substance in foods. Based on suppliers statements, the board types are food safe. Any additional tests required by the customer with regard to MOSH and MOAH (migration test) will be fully at the expense of the customer.

[2)] For inside printing, Direct Food Contact ink with food grade barrier coating is used. Declared by our supplier, the used DFC-ink is safe for use as inside printing of packaging for foodstuffs as mentioned. The marketing and suitability of products with inside printing is the full responsibility of the above mentioned customer and/or food packer.

[3)] In case of window patching, the product may stand in direct contact with aqueous, acid and fatty foodstuffs. Declared by our

supplier, overall migration tests have been carried out as per the Plastic Regulation (EU) No 10/2011 on simulants A, B and D2; the plastic film does not exceed the legal limits (OML). The film is manufactured without the use of MOSH and MOAH.

[4)] In case of inside laminated board, the laminated food contact surface may stand in direct contact with aqueous, acid and dry foodstuffs. Declared by our supplier, overall migration tests have been carried out as per the Plastic Regulation (EU) No 10/2011 on simulants A, B and E; the film does not exceed the legal limits (OML). The film is manufactured without the use of MOSH and MOAH.

Our suppliers and Van de Velde Packaging don't introduce fluorated substances PFOA and PFOS in the production process of the raw materials used for our food grade products.

Disclaimer

It is the sole responsibility of the packer of the final product (foodstuff) to check the suitability of the product (packaging) for the intended application and its compliance with the relevant and applicable requirements including all relevant restrictions therein.

The information provided in this declaration is based on the statements provided by our material suppliers and/or the material analyses by external laboratories. The information provided herein is accurate to our current knowledge. Van de Velde Packaging does not assume any liability for the correctness of these statements and analyses.

This declaration is based on current national and European legislation. It is valid for 2 (two) years after the issued date or until either the customer requirements or legislation have been significantly changed. This document supersedes all previous statements in relation to this issue.

The Netherlands, Monday, December 2, 2024

Van de Velde Packaging Remmert Dekker

Denise Kersten
QESH Manager