

Declaration of compliance for paper bags with liner

We hereby certify that all bags produced and delivered by Mondi Maastricht NV, established in the European community are suited for long term storage (> 6 months) of dry, moist and fatty foodstuffs stored at room temperature (test conditions OM2), not suited for heat treatment. The bags are in accordance with the following legislations;

- EU-Framework Regulation (EC) No 1935/2004 on materials and articles intended for food contact
- Regulation (EC) No 2023/2006 on GMP – Good Manufacturing Practices
- Regulation (EC) No 94/62/EC – on packaging and packaging waste amendments.
- FDA Code of Federal Regulations, Title 21, Chapter 1 (latest edition), §174 - General provisions applicable to indirect food additives § 176.170, 176.180 components of paper and paperboard in contact with aqueous, fatty and dry foods.
FDA Code of Federal Regulations, Title 21, § 177.1520 “Olefin Polymers” Food and Drug Administration (FDA) from 01-04-1996. Title 21, Part 109, Section 109.15 (Use of polychlorinated biphenyls (PCBs) in establishments manufacturing food-packaging materials). None of the substances listed in USFDA Title 21, Part 189, are used in the manufacture of the above packaging material.
- German BfR Recommendations on Food Contact Materials: recommendation III on “Polyethylene” and recommendation XXXVI on “Paper and Board for Food Contact” respecting the monthly updates appearing in the “Bundesgesundheitsblatt”.
- The German “ Lebensmittel- Futtermittelgesetzbuch LFGB” §§ 30 (Verbote zum Schutz der Gesundheit) und 31 Übergang von Stoffen auf Lebensmittel)
- Swiss SR 817.02 (Art 33, 34), SR 817.023.21, including last amendment .
- The plastic complies with RE 2011/10/EC and subsequent amendments.
Monomers or Additives used for producing these raw materials with specific migration limits, which are listed in Appendix I or II of the (EU) regulation No. 10/2011, don’t exceed the specified limits. According to the information provided by these raw material suppliers, some Dual Use Additives can be included in the raw material of the plastics used for the bags. Type depends on used plastic. The surface – volume ratio is around 2dm²/dm³.
- The PE liner and resins comply with the testing requirements, for Dairy Products as regulated by : “The standards of containers/packages of formulated milk powder or their raw materials and the standards of manufacturing” and “JFSL 370 which is under the Japanese Food Sanitation Law
- The PE in liner used complies with the Chinese Food Standard GB 9685-2016 Food Safety National Standards: Use of additives for Food contact Materials and Articles and relevant requirements of

GB4086.1- 2016 Food safety National Standard: general safety requirements for Food contact Materials and Articles. The plastic materials are listed under GB4806.7 – 2016 Food Safety National Standards: food contact plastic materials and articles.

- For the coloring of the plastic, colorants or pigments are used, which are in compliance with the following legal requirements; Farbmittel zum einfarben von Kunststoffen und anderen Polymeren für Bedarfsgegenstände, FDA 21 par. 178.3297 “colorants for polymers”
- The ink supplier stated that Flexographic Inks used by Mondi which are formulated for application to the non contact surfaces of Food Packaging structures, do not and have not, intentionally used mineral oils in general and in particular MOSH (Mineral OH Saturated Hydrocarbon), MOAH (Mineral OH Aromatic Hydrocarbon) or PAH (Polyaromatic Hydrocarbons) as part of their formulations.

All inks and varnishes used for the printing of paper sacks are water based. We do not use UV inks and varnishes (Isopropylthioxanthone (ITX), 2,4-Diethylthioxanthone (DETX)). Our supplier of these water based inks has confirmed to us they do not contain benzophenon or 4-methylbenzopenon. Our ink supplier has stated that their products are formulated and manufactured in accordance with the “EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles”.

- The suppliers of the glues (starch for paper to paper and dispersion for paper to PE) have confirmed that the glue applies to
 - regulation (EC) No 1935/2004.
 - The composition of the product complies with the requirements of the German BfR (Federal Institute for Risk Assessment) - Recommendation XIV. 'Kunststoffdispersionen' (Plastics Dispersions), concerning the dispersion glue
 - The product can be used for the production of articles of paper and board, which comply with the German requirements of BfR - Recommendation XXXVI. 'Papiere, Kartons und Pappen für den Lebensmittelkontakt' (Paper and board for food contact)
 - The product is in compliance with the Federal Drug and Cosmetic Act for the use in adhesives according to FDA Regulation 21 CFR 175.105 'Adhesives'.
 - The "Monomers and Other Starting Substances" used in the manufacture of the product are listed in the Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food and/or amendments thereof.

Conditions of use

- Empty bags can be stored for 1 year in a aerated location (30% - 70% RH), not exposed to extreme temperatures or direct sunlight (5 -40 °C).
- The sacks and pallets are marked with a batch number to guarantee traceability.
- The verification if the packaging or packaging film is suitable for the intended purpose of use and the filled good is subject to the user, i.e. the packaging manufacturer is not responsible for quality modifications of the packed food due to chemical reactions with the packaging material or its component.

Global migration

The overall migration results obtained of the bags are in compliance with the restriction for the overall migration limit (< 10 mg/dm²) as defined in Commission Regulation (EU) No 10/2011 for food contact materials for the test with 3 % acetic acid, 10 % ethanol, 95 % ethanol and iso-octane under the below mentioned test conditions.

Simulants	Test conditions	Results (in mg/dm ²)
10 % ethanol	10 days at 60 °C, single side contact	< 1.0
3 % acetic acid	10 days at 60 °C, single side contact	< 1.0
95 % ethanol *	10 days at 60 °C, single side contact	< 5.0
Iso-octane *	10 days at 20 °C, single side contact	< 5.0
MPPO	10 days at 40 °C, single side contact	<2.0

Information about restricted substances and / or specifications

- Substances subject to SML or QM listed below may be used in the following PE grades:
 - Extra care LDPE (101)
 - High care LDPE (300/301/302)
- Substances are named in the below table. The compliance of the limits is confirmed for the stated types of food and conditions of application. These statements are based on the documentation of the issuer of the declaration of compliance (supplier supporting documents).

EC ref.nr.	CAS nr.	Chemical name/nature	SML (mg/kg food)
68320	002082-79-3	Octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl propionate	6
18820	000592-41-6	1-Hexene	3
24550 & 89040	000057-11-4	Stearic acid	5 (expressed as Zn)
26140	000075-38-7	Vinylidenfluorid	5
18430	000116-15-4	Hexafluorpropylen	<LD= 10 ppb
-----	-----	Copper	5
-----	-----	Iron	48
96240	0001314-13-2	Zink oxide	5 (expressed as Zn)
		Aluminium	1
10120	108-05-4	Vinylacetat	12
10060	000075-07-0	Acetaldehyd	6
17260 54880	000050-00-0	Formaldehyd	15
94960	00078-51-3	1,1,1 –trimethylolpropane	6
17050	104-76-7	Ethylhexanol	30
11500	103-11-17	2-Ethylhexylacrylate	0.05
66755	2682-20-4	2-Methyl-2H-isothiazol-3-on (aka 2-methyl-2H-isothiazol-3-one)	0.5
-----	2634-33-5	1,2-Benzisothiazolin-3-on	0.5

Information about dual use additives according to Regulation (EU) No 10/2011;

EC ref.nr.	CAS nr.	Chemical name/nature
86240	007631-86-9	Silicon dioxide (E551)
24550& 89040	000057-11-4	Stearic acid (E570)
42500	----	carbonic acid, salts
76960/23590	025322-68-3	Polyethylene glycol (E600)
92080	014807-96-6	Talc (E553b)
-----	001592-23-0	Sodium, potassium and calcium salts of fatty acids (E470a)
62720	0001332-58-7	Aluminium silicate (E559)
-----	----	Magnesium oxide (E530)
44160/14680	0000077-92-9	Citric acid
79040	0009005-64-5	polyethyleneglycol sorbitan monolaurate
62240	0001332-37-2	Iron oxide
93440	0013463-67-7	Titanium dioxide
-----	----	Inorganic antiblocking agents(calcium carbonate/magnesium oxide)

Absence of (chemical) substances

- No materials or substances containing Anthraquinone (AQ) are used during production of Pulp Inks are equally compliant to the Swiss regulation as mentioned higher in this document.
- Packaging material does not contain SVHCs (Substances of Very High Concern) in a concentration exceeding 0.1% (w/w), nor are these substances used in any step of the production process (RE 1907/2006/EC "Reach"). Sacs do not contain PVC as part of its composition.
- GMO's and allergens are not intentionally used by our raw material suppliers or in the processes at Mondi.
- Bags do not contain nano particles. For the antislip treatment a colloidal silica is used. As all colloidal silica dispersions are nanoparticles per definition, otherwise they would not be sols (stable colloidal dispersions), if dried these small particles irreversibly aggregate into much bigger agglomerates and aggregates of sizes in the micrometer range and cannot be considered as nanoparticles anymore. The amorphous nature of colloidal silica has been extensively assessed through X-ray diffraction.
- Bags do not contain active and intelligent materials and objects which are intended to get into contact with food (EU Regulation 450/2009/EC).
- Packaging material does not contain SVHCs (Substances of Very High Concern) in a concentration exceeding 0.1% (w/w), nor are these substances used in any step of the production process (RE 1907/2006/EC "Reach"). Sacs do not contain PVC as part of its composition
- (EC) No 1895/2005 – the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food and amendments.
- No recycled materials (282/2008/CE) are used for production of film for food. Since all raw materials (paper) are produced from virgin material and no recycled material is used . Therefore presence of mineral oils MOSH/MOAH originating from the packaging should not be expected.

- During the manufacturing process reaction- and degradation –products of formulations components may be formed (so called NIAS, not intentionally added substances). To show the absence of these substances NIAS testing is performed on regular base. No substances were detected above the 10 ppb detection limit.

The PE used has been manufactured from raw materials, which, according to the information available to us do not intentionally contain:

- Acrylonitrile (CAS 203-466-5)
- 2-Ethylenhexane acid (2-EHA - CAS 149-57-5)
- 2,2,4-Trimethyl-1,3-Pentanediol Diisobutyrate (TXIB) (CAS 6846-50-0) SML 5,0mg/kg
- 2,2,4'-trichloro-2'-hydroxydiphenylether (2010/169/EG)
- 4-Methylbenzophenon (CAS 00134-84-9)
- 4,4'-Diaminodiphenylmethan - DADPM (CAS 101-77-9)
- 5-tert-buthyl-2,4,6-trinitro-m-xylene (Musk Xylene - CAS 81-15-2)
- Alkanes, C10-13, Chlore (CAS 85535-84-8)
- Antimon III Oxid (CAS 1309 64 4)
- Aromatic amines (2001/62/EC supplement IV)
- Azodicarbonamide (E927) (CAS 123-77-3)
- Benzophenone (CAS 119-61-9), 4-methylbenzophenone (CAS 134-84-9), Benzo-[a]pyren (CAS 50-32-8) and Derivatives of Divinylbenzol (2002/017/EG) .
- Bisphenol A BPA (CAS 80-05-7), Bisphenol-F (CAS 00620-92-8), Bisphenol S (CAS 80-09-1)
- Phthalates: DBP, BBP, bis(2-ethylhexyl) benzene-1,2-dicarboxylate DEHP (CAS 117-81-7), DINP (diisononyl phthalate), Di-N-Octyl Phthalate (DNOP), Di- Isodecyl Phthalate (DIDP) ; Diisobutyl phthalate (DIBP), BADGE (bisphenol A diglycidyl ether); BFDGE, DEP, DIBP, DMEP, DPEP and NOG (RE 1895/2005/EC).
- brominated flame retardants (2014/118/EU)
- BTEX Solvents (benzene, Toluene, xylene, ethyl benzene, styrene)
- Epoxy derivates like "BADGE", "BFDGE" or "NOGE" (EU regulation 1895/2005)
- Epoxidised soybean oils (ESBO)
- Isophthalic acid (CAS 121-91-5), Terephthalic acid (CAS 100-21-0), Acetaldehyde (CAS 75-07-0)
- Isopropylthioxanthon (ITX) - (CAS 05495-84-1), Diethylthioxanthon (DETX) - (CAS 82799-44-8) - UV Photo initiators like
- Isothiazolinone (CAS 1003-07-2) or other anti-microbials
- Melamine (CAS 108-78-1)
- Metals like Zinc, Iron, Manganese, Copper, Barium, Cobalt
- Mineral oils ((MOSH and MOAH).
- Nanoparticles (sized between 1 and 100 nanometres)
- Nonylphenol (CAS 84852-15-3), Tris (nonylphenyl) phosphite TNPP(CAS 26523-78-4)
- PCB (polychlorierte Biphenyle)
- Perfluoroktan acid (PFOA) - (CAS 335-67-1) or Perfluoroktansulfonat (PFOS) - (CAS 1763-23-1)
- Phenols, like Brenzcatechin, Resorcin, Hydrochinon, 1,4-Naphthohydrochinon. Phloroglucin (1,3,5-Trihydroxybenzol) or Pyrogallol (1,2,3-Trihydroxybenzol), 2,4,6 Tribromophenol (TBP CAS 118-79-6)
- Polybrominated diphenyl ethers – C₁₂H₁₀-xBr_xO - or PBDE, like CAS 101-55-3 (4-MBDE), or CAS 32534-81-9 and HBCDD (Hexabromocyclododecane (CAS 25637-99-4)
- Polycyclic aromatic hydrocarbons (PAHs - PAKs)

- PVC, PVDC and / or tenderizers, other halogen-containing plastics or hydrocarbons with halogen and ESBO (CAS 008013-07-8)
- Semicarbazid (CAS 57-56-7) or Hydrochlorid (CAS 563-41-7)
- Toluol (CAS 000108-88-3, Benzol (CAS 000071-43-2),
- Tributylzinnhydrid (TBT) - (CAS 688-73-3)
- Triclosan (CAS 3380-34-5)
- Vinyl chloride monomer (CAS 75-01-4)
- Zonyl RP

The presence of these substances in our finished product is not expected, but has not been confirmed by testing.

Maastricht, 29/10/2019

A handwritten signature in blue ink, appearing to read "Collin Pustjens".

Collin Pustjens
Quality Assurance

The document remains good-till-the expire date (2 years) or till cancelled because of changes in the product, process, or legal requirements, which effects this document and for which Mondi will inform the customer. The information mentioned above is according to our knowledge. It is provided in good faith primarily bases on the declaration of compliance submitted by our raw material suppliers. The food packer is responsible for ensuring that the finished food package complies with applicable migration limits in the food itself under actual conditions of use. Possible interaction of the packaging material and its component with the foodstuff or pet food (i.e. modification of oder, taste, consistency, migration etc.) are to be checked prior to use in function of the end uses.