

## Declaration of compliance for bags suited for containing dry, moist and fatty foodstuffs. (stored at room temperature)

We hereby certify that all bags (consisting of paper, ink, glue and in some cases PE liner) produced and delivered by Mondi Maastricht NV, established in the European community 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
- (EC) No 1895/2005 – the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food and/or amendments thereof.
- 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.
- Regulation (EC) No 94/62/EC – on packaging and packaging waste and/or amendments thereof.
- 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.
- 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 48, 49), SR 817.023.21, including last amendment from 01/04/2013.
- French Decree no 2007-766 with supplement of decree no 2008-1469.
- We further can confirm that following substances are not intentionally used by our raw material suppliers or in the processes at Mondi : Bisphenol A BPA (CAS 80-05-7) , Bisphenol-F (CAS 00620-92-8), Bisphenol S (CAS 80-09-1) and 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), (bisphenol A diglycidyl ether); BFDGE and NOG (RE 1895/2005/EC).
- 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.

- 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.
- Our 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 (Polycyclic Aromatic Hydrocarbons) as part of their formulations.

Inks are equally compliant to the Swiss regulation as mentioned higher in this document.

- 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 benzophenone or 4-methylbenzophenone. 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'.

#### *For bags with plastic film or liner (multi-layer – multi-material)*

- The "Monomers and Other Starting Substances" used in the manufacture of the product are listed in the Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food and/or amendments thereof.

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. The surface – volume ratio is around  $2\text{dm}^2/\text{dm}^3$ .

### Global migration

The overall migration results obtained of the bags are in compliance with the restriction for the overall migration limit (< 10 mg/dm<sup>2</sup>) as defined in Commission Regulation (EU) No 10/2011 for food contact materials for the test with 3 % acetic acid, 10 % ethanol, 95 % ethanol, iso-octane and MPPO under the below mentioned test conditions.

| Simulants       | Test conditions                       | Results (in mg/dm <sup>2</sup> ) |
|-----------------|---------------------------------------|----------------------------------|
| 10 % ethanol    | 10 days at 40 °C, single side contact | < 5                              |
| 3 % acetic acid | 10 days at 40 °C, single side contact | < 5                              |
| 95 % ethanol *  | 10 days at 40 °C, single side contact | < 5                              |
| Iso-octane *    | 2 days at 20 °C, single side contact  | < 5                              |
| MPPO            | 10 days at 40 °C, single side contact | <2                               |

### Conditions of use

- Empty bags can be stored for 1 year in an 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 components.

Maastricht, 13/05/2022



Mark Rouwette  
QA Mondi Maastricht

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.