

## DECLARATION OF COMPLIANCE

### for materials and articles intended to come into contact with food

**The identity and address of the business operator issuing the declaration of compliance.**

**The identity and address of the business operator which manufactures or imports the plastic materials or articles or products from intermediate stages of their manufacturing or the substances intended for the manufacturing of those materials and articles.**

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REGON 276891090  
KRS 0000199267

**The identity of the materials, the articles, products from intermediate stages of manufacture or the substances intended for the manufacturing of those materials and articles.**

This declaration applies to Sample/Vento-bag 1,5 kg/Mr Paper WS70/Viscose net called also ZD5467 PARMENTINE ZRP SALADE VAPEUR RISSOLEE 1.5KG.

Sample/Vento-bag 1,5 kg/Mr Paper WS70/Viscose net is package made of a paper, coated with a heat-sealable layer, combined with a viscose mesh, printed with water-based inks, intended for food packaging.

**The date of the declaration.**

This declaration was prepared: 03.11.2022

**Confirmation that the plastic materials or articles, products from intermediate stages of manufacture or the substances meet relevant requirements laid down in this Regulation and Regulation (EC) No 1935/2004.**

Sample/Vento-bag 1,5 kg/Mr Paper WS70/Viscose net meets with the following regulations:

- REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC,
- COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food,

- COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food,
- EUROPEAN PARLIAMENT AND COUNCIL DIRECTIVE 94/62/EC of 20 December 1994 on packaging and packaging waste,
- BfR Recommendation XXXVI Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 222<sup>nd</sup> Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019).

**Adequate information relative to the substances used or products of degradation thereof for which restrictions and/or specifications are set out in Annexes I and II to this Regulation to allow the downstream business operators to ensure compliance with those restrictions.**

**Adequate information relative to the substances which are subject to a restriction in food, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 2008/60/EC, 95/45/EC and 2008/84/EC to enable the user of these materials or articles to comply with the relevant EU provisions or, in their absence, with national provisions applicable to food.**

#### Overall migration

Test	Method	Food simulant	Test conditions	Unit	Result	Criteria	Parameter compliant / non-compliant
Chromium (VI)	PB-269 ed I of 02.06.2014	-	-	mg/kg	< 5,0	-	-
Overall migration - food simulant A	PN-EN 1186-1:2005	tenax	10 days at 40°C	mg/dm <sup>2</sup>	1,4 (1,3; 1,4; 1,4) ±1,2	≤ 10	compliant
Content of elements (heavy metals acc to Directive 94/62/EC)	PB-233/ICP ed. II of 15.11.2017						
Cadium (Cd)		-	-	mg/kg	< 0,5	-	-
Lead (Pb)		-	-	mg/kg	< 2,0	-	-
Mercury (Hg)		-	-	mg/kg	< 0,5	-	-
Total content lead, cadium, mercury and chromium (VI)		-	-	mg/kg	< 100	≤ 100	compliant

#### Declaration on phthalates

We confirm that in the manufacture of the subject packaging we do not intentionally add or otherwise knowingly introduce phthalates.

**BROWN PAPER**

According to supplier's documents brown paper may stand in direct contact with dry, moist and fatty foods.

**Mineral oils statement**

According to supplier's information paper is produced from virgin unbleached pulp. Supplier do not intentionally add any raw material containing mineral oil in the production of the paper products and does not expect to find measurable levels of mineral oil in final paper.

**Declaration on per and polyfluoroalkyl substances (PFAS)**

This declaration is based on information from our suppliers documentation.

According to our supplier, the paper is 100% pure virgin fiber based paper. We confirm that in the manufacture of the subject materials we do not intentionally add or otherwise knowingly introduce „per and polyfluoroalkyl substances“.

**HEAT-SEALABLE LAYER**

The table below lists only those migratable monomers and starting substances of the heatseal product which are restricted with specific limits, and the ones which have not been evaluated on European level. All substances, which are listed in the Plastics Regulation but without any SML value, are covered by the compliance with the overall migration and do not require any additional monitoring.

**SML – Specific Migration Limit**

FCM no.	CAS no.	Name	SML / Limitation
231	000108-05-4	Acetic acid, vinyl ester	SML = 12 mg/kg <sup>1)</sup>
----- <sup>4), 5)</sup>	002634-33-5	1,2-Benzisothiazolin-3-one	SML = 0,5 mg/kg <sup>2), 3)</sup>
451	002682-20-4	2-Methyl-4-isothiazolin-3-one	SML = 0,5 mg/kg <sup>1)</sup>
799 <sup>4), 5), 6)</sup>	-----	Polyethyleneglycol (EO = 1-50) ethers of linear and branched primary (C <sub>8</sub> -C <sub>22</sub> ) alcohols	SML = 1,8 mg/kg <sup>1)</sup>
-----	026172-55-4	5-Chloro-2-methyl-3(2H)-isothiazolone	SML = ND (DL = 0,01 mg/kg <sup>2)</sup> max 0,003 mg/dm <sup>2</sup> in dispersion film <sup>7)</sup> max 0,1 ppm in transferable residue of paper and cardboard <sup>8)</sup> SML = 0,05 mg/kg <sup>9)</sup>

- 1) Same restriction in the ResAP (2004)<sup>1</sup> and Plastics Regulation
- 2) Restriction of the ResAP (2004)<sup>1</sup>
- 3) EFSA opinion SDS EFSA/AFC/FCM 605-Rev.IIB/37520 from August 2007
- 4) Preservative (biocide)
- 5) Not listed in Annex 2 to the SR 817.023.21 but in Annex 9 in the list of authorized substances for the manufacturing of commodities from silicon
- 6) Not listed in the Plastics Regulation but in the XIV. BfR Recommendation and DM 21/03/1973
- 7) Restriction of the XIV. BfR Recommendation
- 8) Restriction of DM 21/03/1973
- 9) Restriction of Annex 9 to SR 817.023.21

### **Epoxy Regulation**

Heat-sealable layer does not contain any epoxy derivatives as part of its formulation, i.e. BADGE and its derivatives, NOGE and BFDGE as mentioned in the European Regulation (EC) No 1895/2005. These substances are not added to the finished product. Producer does not have any reason to expect that these substances are being formed during the manufacturing process.

### **NIAS**

Caused by their manufacturing processes, raw materials and products contain unintentionally introduced substances, so-called NIAS (non-intentionally added substances). From supplier's point of view, these involve either impurities, by-products, decomposition products or reaction products which are technically unavoidable and have to be taken into account for the risk assessment of the final product according to the European Commission.

The NIAS listed below are based on information from raw material suppliers and/or findings of coating producer's own investigations. Substances present in above named adhesive without intention involve:

- Polymerisation by-products – producer assumes that this NIAS evaporates during the drying process.
- Degradation products – due to the fact that initiators are used at a very low level the quantity of both decomposition products is very low and producer assumes that both evaporate during the drying process.

### **Bisphenol A**

Bisphenol A (BPA, CAS no. 80-05-7) is not part of formulation of heat-sealable layer. It is not present in raw materials for the product and not released during the drying of the product, either. This substance is not added to the finished product. Supplier does not have any reason to expect that this substance is being formed during the manufacturing process. Consequently, supplier does not check its presence.

## VISCOSE NET

On 21<sup>st</sup> July 2016 the „Fraunhofer Institut für Verfahrenstechnik und Verpackung“ located in 85334 Freising confirmed that there are no special food regulations for this type of yarn. It this material is exclusively used as a viewing window for potato bags (unpeeled vegetables), no migration test are required according to COMMISSION REGULATION (EU) No 10/2011.

Supplier of the binder also confirms that the binder used in the net complies with the plastic ordinance 10/2011. These binders are e.g also used as cheese rind.

Viscose net contains no heavy metals and no formaldehyde.

## WATER BASED INK

In general, inks used in product are formulated in accordance with the EuPIA Exclusion Policy available under [www.eupia.org](http://www.eupia.org). The use of pigment colorants based on and compounds of antimony, arsenic, cadmium, chromium (VI), lead, mercury, selenium as well as certain dyes, solvents, plasticizers and miscellaneous materials as outlined in Annex 1 of the EuPIA Exclusion Policy is as well excluded.

## ADHESIVE PAPER LABEL

The adhesive complies with the European food directives and legislations, FDA 175.105 and the German recommendations XXI as published by BfR. BfR (Bundesinstitut für Risikobewertung) is the German Federal Institute for Risk Assesment. The adhesive can be used in direct contact with dry and moist, non fatty foodstuffs.

### Specifications on the use of the material or article, such as:

- **type or types of food with which it is intended to be put in contact,**
- **time and temperature of treatment and storage in contact with the food,**
- **ratio of food contact surface area to volume used to establish the compliance of the material or article.**

Sample/Vento-bag 1,5 kg/Mr Paper WS70/Viscose net may stand in direct contact with dry, moist and fatty foods.

Sample/Vento-bag 1,5 kg/Mr Paper WS70/Viscose net is suitable for contact with any foodstuff for any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.

Silbo sp. z o.o. has not evaluated the performance of laminate at low temperatures ( $\leq 0^{\circ}\text{C}$ ).

The contact surface is assumed to be 6 dm<sup>2</sup> per kg food.

**When a functional barrier is used in a multi-layer material or article, the confirmation that the material or article complies with the requirements of Article 13(2), (3) and (4) or Article 14(2) and (3) of this Regulation.**

Silbo sp. z o.o. does not offer an assurance that laminate would perform as a functional barrier to the migration of individual substances in any specific packaging structure or for any specific food contact application.

**This declaration was prepared by:**

Marcin Sintera  
Technologist

Place of issue: Żory  
Date of issue: 03.11.2022