

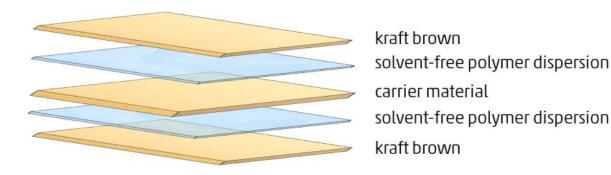
## **Declaration of conformity**

Product name: BioMind® brown/brown

Varenr. 5652, 5653, 16605, 9624

#### **Product structure:**

side facing the food



side to be printed

The company Jade-Pack GmbH has a quality and documentation system and is certified according to the DIN ISO 9001:2015 certified. Our suppliers are also certified according to DIN ISO 9001:2015.

The product BioMind® brown/brown complies with the legal requirements and regulations for direct or indirect contact with foodstuffs.

European Framework Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food

European GMP Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

Deutsches Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuchs- LFGB vom 01.09.2005 Deutsche Bedarfsgegenständeverordnung in der Fassung vom 23.12.1997

Richtlinie 94/62/EG (Stand 20.11.1994)

**BfR Recommendation XXXVI** 

European Biocide Regulation (EU) No. 528/2012



### **Product features**

Application: for packaging with special barrier properties in the food and packaging

sector.

Printing<sup>1</sup>: with all common printing methods.

Bonding<sup>1</sup> (folding box): with suitable adhesives such as dispersion adhesives or hotmelt.

Test bonding in advance!

Food contact: Direct contact with dry, non-fatty and fatty

food and with food that has been peeled or washed. In case of direct food

contact the use the appropriate approved paper surface.

)<sup>1</sup>: for additional information we recommend to contact fluid suppliers.

## The product consists of the following components:

Laminating paper: kraft brown

The laminating paper has been tested by an independent institute according to the following method:

"Method of analysis of paper, cardboard and board materials intended to come into contact with foodstuffs", as of 2008, in accordance with Regulation No. 80.56 in the official collection of analysis methods pursuant to Section 64 of the German Food and Feed Code (Lebensmittel- und Futtermittelgesetzbuch - LFGB), and in accordance with the specific requirements of the "Guidelines of the Council of Europe on test conditions and methods of analysis for paper and board materials intended to come into contact with foodstuffs", technical document No. 2, version 3 of 14.11.2007, with regard to the raw materials, manufacturing aids and special paper finishing materials used, as well as the release of fractions which are hazardous to health.

In addition, an investigation was carried out in accordance with the following regulations:

Directive 94/62/EC (Status 20.11.1994)

Heavy metal content according to DIN EN 71, part 3 (as of August 2018)

Migration according to DIN EN 71 (as of January 2006)

BfR Recommendation XXXVI

Council of Europe Resolution AP (2002)

The laminating paper quality can be safely used for food packaging in direct contact with dry and fatty foods.



**Adhesive:** solvent-free polymer dispersion

The adhesive is produced in accordance with the following regulations:

(EG) Nr. 2023/2006 über gute Herstellungspraxis (Verpackung).
USA FDA 21 CFR 175.105 - Indirekte Lebensmittelzusatzstoffe: Klebstoffe

In addition, the (polymeric) dispersions used also comply with the German BfR recommendation XIV Part A - polymer dispersions. The raw materials used have been evaluated for their suitability in the above mentioned food contact application area with defined restrictions. The following substances were not used in the production of the adhesive:

Substances subject to authorization (Annex XIV to Regulation (EC) No 1907/2006).

- Substances, which are restricted (Annex XVII to Regulation (EC) No 1907/2006).
- Substances, which are considered to be Substances of Very High Concern (SVHC) (Candidate list to Annex XIV to Regulation (EC) No 1907/2006; last updated 15th January 2019).
- Substances and/or preparations as classified as CMR category 1A or 1B and 2, following CLP Regulation (EC) No 1272/2008.
- Substances that deplete the ozone layer (Regulation (EC) No 1005/2009).
- Epoxy derivatives which are restricted (Regulation (EC) No 1895/2005).
- Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE) (Directive 2011/65/EU).
- Alkanes, C10-C13 (CAS 85535-84-8); short chain chlorinated Paraffins.
- Phthalates.
- Azocolourants.
- Dimethylfumarate (Regulation (EC) No 412/2012).
- Nonylphenolethoxylates and/or Nonyl phenol.
- Borax (sodium tetraborate), boric acid or any of its compounds.
- Allergens as listed in Annex II of Regulation (EU) No 1169/2011 (amended by (EU) No. 78/2014).
- Nanomaterials.
- Raw materials or ingredients derived from animal origin.
- Genetically Modified Organisms (GMO)

The adhesives are not regulated in the Plastics Regulation (EC) No. 10/2011. To the best of our knowledge, the components and/or monomers are listed in Annex I of 10/2011 without restrictions (with the following exceptions):



Constituent	Concentration	(EC) No. 10/2011	Remarks
Vinyl acetate	< 400 ppm	SML 12 mg/kg	Originating from used dispersion(s)
Film forming agent	< 5 w/w%	Not listed	EU: Listed in Resolution AP (96) 5 - List 2 (Additives) Swiss Ordinance: Listed in SR 817.023.21 – Annex 6, III, Part B USA: Cleared for use in accordance with FDA 21 CFR §175.105
Benzoate plasticizer (mixture of propylene-, dipropylene- and diethylene glycol dibenzoates)	< 1 w/w%	Not listed	USA: Cleared for use in accordance with FDA 21 CFR §175.105, §176.170 and §176.180
MIT (2-methyl-2H-isothiazol-3-one)	< 210 ppm	SML 0.5 mg/kg	See section "biocides" for details
BIT (1,2-benzisothiazol- 3(2H)-one)	< 210 ppm	Not listed	See section "biocides" for details
Bronopol (2-bromo-2- nitropropane-1,3-diol)	< 90 ppm	Not listed	See section "biocides" for details
CMIT (5-chloro-2-methyl-4- isothiazolin-3-one); mixture of CMIT/MIT in a ratio of 3:1	< 9 ppm	Not listed	See section "biocides" for details



Country/State	Regulation	Comments		
Europe	EU 10/2011	Not applicable. Adhesives, coatings and printing inks are not subject of this regulation. MIT listed under PM Ref. no. 66755, SML 0.5 mg/kg. Only to be used in aqueous polymer dispersions and emulsions.		
Europe	ResAP(2004)1 - Technical document No. 1	BIT: listed under PM Ref. 37520, SML 0.5 mg/kg.  MIT: listed under PM Ref. 66755, SML 0.5 mg/kg.  BIT and MIT: only for use in aqueous polymer dispersions and emulsions and at concentrations which do not result in an antimicrobic effect at the polymer surface or in food itself.  Bronopol: listed under PM Ref. 40460.  CMIT: listed under PM Ref. 43760, SML to be fixed		
Germany	BfR XIV – polymer dispersions	BIT: max. 80 μg/dm² in dispersion film; MIT: max. 40 μg/dm² in dispersion film; Mixture CMIT/MIT 3:1: max. 4 μg/dm² in dispersion film. Inputs from other uses must comply with the restrictions laid down for these fields. In the extracts of the final products the following levels must not exceeded: BIT: max. 80 μg/dm²; MIT: max. 80 μg/dm². Mixture CMIT/MIT 3:1: max. 25 μg/dm². Bronopol: max. 0.032 mg/dm² in dispersion film.		
Germany	BfR XXXVI - paper and board for food contact	For use as slimicide and preservative in paper production: BIT: max. 10 µg/dm² detectable in extract of final product; MIT: max. 1 µg/dm² detectable in extract of final product; Mixture CMIT/MIT 3:1: max. 0.5 µg/dm² of the mentioned isothiazolinones in total detectable in extract of final product. Inputs from other uses must comply with the restrictions laid down for these fields. In the extracts of the final products the following levels must not exceeded: BIT: max. 80 µg/dm²; MIT: max. 80 µg/dm². Mixture CMIT/MIT 3:1: max. 25 µg/dm². For use as slimicide in paper production:  Bronopol: max. 0.003% rel. to dry fibre (not detectable in extract of final product).		
Netherlands	Warenwet Chapter II - Paper & Board	For use as slimicide:  MIT: SML 0.5 mg/kg (individual or with CMIT); CMIT: SML 0.025 mg/dm² (as mixture CMIT/MIT 3:1);  BIT: SML 30 mg/kg (also listed as preservative for the preservation of coatings).		
Netherlands	Warenwet Chapter X - Coatings	Listed as preservatives:  MIT; BIT: SML 30 mg/kg; Bronopol; CMIT: SML 0.01 mg/dm² (individual or as mixture CMIT/MIT 3:1).		
USA	FDA 21 CFR 175.105 – Adhesives	Substances for use as components of adhesives: BIT: for use as preservative only; MIT: as antimicrobial agent in adhesives and in components of adhesives (FCN 000111). Shall be in accordance with 21 CFR 175.105; Mixture CMIT/MIT 3:1: for use only as an antimicrobial agent in polymer latex emulsions; Bronopol: for use only as an antibacterial preservative.		
USA	FDA 21 CFR 176.170 - Components of paper and paperboard in contact with aqueous and fatty food	BIT: only as preservative in paper coating compositions at a level not to exceed 0.01 mg/in² (0.0016 mg/cm²) of finished paper and paperboard; MIT: as antimicrobial agent: 1. in coating formulations and in additives for use in manufacture of paper and paperboard at a level not to exceed 150 mg/kg in the coating formulations and additives; 2. for polymer latex emulsions in paper coatings at a level not to exceed 250 mg/kg (FCN 000111); Mixture CMIT/MIT 3:1: For use only: 1. as an antimicrobial agent for polymer latex emulsions in paper coatings at a level not to exceed 50 ppm (as isothiazolone active ingredients) in the coating formulation; 2. as an antimicrobial agent for finished coating formulations and for additives used in the manufacture of paper and paperboard including fillers, binders, pigment slurries, and sizing solutions at a level not to exceed 25 ppm (as isothiazolone active ingredients) in the coating formulations and additives; Bronopol: for use only as an antimicrobial/preservative in		
		fillers, pigment slurries, starch sizing solutions, and latex coatings at levels not to exceed 0.01% by weight of those components.		
USA	FDA 21 CFR 176.180 - Components of paper and paperboard in contact with dry food	weight of those components.  BIT: only as preservative in paper coating compositions at a level not to exceed 0.02 mg/in² (0.0032 mg/cm²) of finished paper and paperboard; MIT: additives for use in manufacture of paper and paperboard at a level not to exceed 150 mg/kg in the coating formulations and additives; 2. for polymer latex emulsions in paper coatings at a level not to exceed 250 mg/kg (FCN 000111); Mixture CMIT/MIT 3:1: For use only: 1. as an antimicrobial agent for polymer latex emulsions in paper coatings at a level not to exceed 50 ppm (as isothiazolone active ingredients) in the coating formulation; 2. as an antimicrobial agent for finished coating formulations and for additives used in the manufacture of paper and paperboard including fillers, binders, pigment slurries, and sizing solutions at a level not to exceed 25 ppm (as isothiazolone active ingredients) in the coating formulations and additives; Bronopol: for use only as a microbial/preservative in fillers, pigment slurries, starch sizing solutions, and latex coatings at levels not to exceed 0.01% by weight of those components.		



Carrier material: testliner

The carrier material was examined by an independent institute according to the following method:

"Method of analysis of paper, cardboard and board materials intended to come into contact with foodstuffs", as of 2008, in accordance with Regulation No. 80.56 in the official collection of analysis methods pursuant to Section 64 of the German Food and Feed Code (Lebensmittel- und Futtermittelgesetzbuch - LFGB), and in accordance with the specific requirements of the "Guidelines of the Council of Europe on test conditions and methods of analysis for paper and board materials intended to come into contact with foodstuffs", technical document No. 2, version 3 of 14.11.2007, with regard to the raw materials, manufacturing aids and special paper finishing materials used, as well as the release of fractions which are of concern to health.

In addition, an investigation was carried out in accordance with the following regulations:

Directive 94/62/EC (Status 20.11.1994)
Heavy metal content according to DIN EN 71, part 3 (as of August 2018)
Migration according to DIN EN 71 (as of January 2006)
BfR Recommendation XXXVI

Council of Europe Resolution AP (2002)

no substances on ECHA's SVHC candidate list of 16.07.2019 are actively added to the paper making process by chemical additives

## Recyclability:

Laminating paper: recyclable
Adhesive: recyclable
Carrier material: recyclable

VO 10/2011: According to Annex V Chapter 2 of Regulation (EC) No 10/2011, the migration test

must always be done on the finished article under practical conditions.

BfR XXXVI: The materials used comply with the 36th recommendation.



# For your attention

The information in this conformity is based exclusively on the information provided by our suppliers. They do not exempt the processor from carrying out his own tests and trials due to the wide range of possible influencing factors when processing and using our finished products. A legally binding assurance of certain properties or the suitability for a specific application cannot be derived from our information. Before selling the finished article, the user is obliged to carry out his own tests with the end product under the specific conditions of use. We accept no liability for damage in applications for which the product is not intended. The declaration of conformity is valid for 2 years and comprises 7 pages.

Varel, 30.03.2021

Jade-Pack GmbH Hans-Schütte-Straße 21 26316 Varel

Rainer Lübsen Produktentwicklung