

MP: CAJAS CON VENTANA
REF.: 221.10

Garcia De Pou Sociedad Anonima
Ctra. Ordis a Navata, s/n
17772 Ordis (Girona)
ESPANA

8 February 2018

STATEMENT

As requested we are confirming that our cartonboard quality (qualities)

Grafopak Kraft (3:4:101)

is (are) produced to the generally approved technical requirements using paper for recycling and complies (comply), when used in accordance with its (their) suitability, with the Foodstuffs and Animal Feeding Code – LFGB of the Federal Republic of Germany in the version of the notification of 03 June 2013 (BGBl. I S. 1428), last modified by art. 4 paragraph 19 of the law of 18 July 2016 (BGBl. I p. 1666), paragraph 30 and 31.

The cartonboard quality (qualities) also complies (comply) with the recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 34th notification, federal law gazette 10, 14 (1967), including the 220th memorandum, Federal Health Journal 59, 1365-1368, state of 1 July 2016, provided the board can be considered suitable **for dry foodstuffs in direct contact in the sense as it is confirmed by this letter**. No comments are given on the technical suitability of the requisite concerned.

Furthermore the cartonboard quality (qualities) complies (comply) with the requirements of the resolution of the European Council AP (2002) 1 about paper, cartons and cartonboard for food contact of 17 September 2002, whereupon instead of the techn. doc. 1 which is not implemented up to now the stated list of factory additives of the recommendation XXXVI of the German "BfR" have been consulted.

The cartonboard quality (qualities) mentioned herein also complies (comply) with Austrian regulations particularly with the food packaging regulations (LMSVG of 20 January 2006, BGBl. I, no. 13/2006).

The provisions of the regulation (EC) No. 1935/2004 of the European Parliament and the Council of 27 October 2004 as well as of the regulation (EC) No. 2023/2006 of the European Parliament and the Council of 22 December 2006 concerning materials and articles which are intended to be brought into contact with foods are therewith fulfilled.



The processes and procedures in our mill are well established, controlled and measured by excellent quality management systems such as ISO 9001 (since 1996) and hygiene management systems, EN 15593 and INREKA-HACCP-Standard (since 2002). The risk management as well as the root-cause analysis are an essential part of our management systems and ensures a safe production of board for food applications.

This statement is valid for deliveries until 31 December 2018, provided there is no prior change to the regulations.


This document is issued electronically.



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DECLARATION OF COMPLIANCE FOR FOOD CONTACT MATERIALS AND ARTICLES

 hereby declares that the product **CAT_AVA –BIORIENTED POLIPROPYLENE FILM** is produced according to Good Manufacturing Practice (GMP) for materials and articles intended to come into contact with food and complies with the European Union (EU) legislation for food contact materials and articles.

EU

Regulation (EC) No 1935/2004 of 27th October 2004 (Articles 3, 11 (5), 15 and 17) and its amendments;

Regulation (EC) No 2023/2006 of 22nd December 2006 and its amendments;

Regulation EU No 10/2011 of January 2011 and its amendments 321/2011, 1282/2011, 1183/2012, 202/2014, 865/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/213 and 2018/831;

SPAIN

Royal Decree 866/2008


Royal Decree 1262/2005

Orden SCO/3508/2006

USA

Regulation FDA chapter 21 CFR 177.1520

It also states that:

- The factory is inscribed in the Spanish "Registro Sanitario de Alimentos" (The General Food and Health Register) number 3901868C.
 - Raw materials used in the production of the film meet the conditions outlined in the EU legislation, the lists of approved monomers and additives for plastic materials and articles intended to come into contact with foodstuffs;
 - Product traceability is ensured;
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- According to the Act. 11/1997 concerning "Packaging and Packaging waste", (including Directive 94/62/EC) and Directive 2004/12/EC, the sum of heavy metals: leads, cadmium, mercury and hexavalent chromium lies under 100 ppm in weight.
- The polymeric materials are used in proportions that ensure the overall provision to the food product will not produce specific migrations values exceeding the limits defined in EU legislation. The following table shows the possible substances with Specific Migration Limits (SML) , which may be present in the film:

Table 1 – Substance Ref No / SML

PM RFF N	SML (mg/Kg)
19960	30,0
21130	6
38820	0,6
39090	1,2
39120	1,2
39815	0,05
39925	0,05
68320	6,0
74880	0,3
83595	18,0
95360	5,0

DUAL USE
Aluminium (E173)
Citric acid (E330)
Calcium, potassium and sodium salts of fats acids (E470a)
Mono- and diglycerides of fatty acids (E471)
Silicon dioxide (E551)

SPECIFICATION OF THE INTENDED USE OR LIMITATIONS

1. Types of food intended to come into contact with material:
Foodstuffs: aqueous, acids, alcohols, fats and dried.



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2. Duration and temperature of treatment and storage while in contact with the food:

Tested: 10 days, 40°C.

3. Ratio of the area of the food contact material to the volume used to determine the compliance of the plastic food contact material or article

6 dm²/Kg

This declaration of compliance is valid for a period of 2 years from the date mentioned below and is subject to revision if changes occur in legislation, raw materials, production process or the scientific data that may change the conditions of product conformity.

The statement does not contemplate any change made to the product, resulting from adding any other kind of substances (adhesives and adhesion promoters, printing inks, pigments and dyes, solvents, etc.) or application of the product under conditions not covered in the specification of the intended use or limitations. The person responsible for the alteration of the product must not place it on the market without first ensuring that it complies with relevant legislation of materials and articles intended to come into contact with food.

The issue of this declaration of compliance was based on the EU legislation applicable to materials and articles intended to come into contact with food, in compliance statements from our suppliers of raw materials and product testing.

Narón, 6 August 2018

