

# DECLARATION OF COMPLIANCE FOR FOOD CONTACT ARTICLES

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Polypropylene Thermal Lamination Film Type:

**LuxeFilms® ScuffProof® Matte OverLaminate**

## SUBSTANCES OF VERY HIGH CONCERN IN THE COATING OF LUXEFILMS® SCUFFPROOF® MATTE OVERLAMINATE

Substances on the so-called Candidate list of “Substances of Very High Concern” (SVHC) pursuant Article 59 of Reach (EC) No 1907/2006 updated 28<sup>th</sup> June 2018 are not being used as raw materials in the formulations of the coated LuxeFilms® ScuffProof® Matte. Those substances are not present with a percentage above 0.1% weight by weight in our product.

## ANNEX XVII REACH

Substances listed on the Annex XVII - Reach Regulation – Restrictions on the manufacture, placing on the market and use of certain dangerous substances, preparations and articles (February 15, 2017) – are not being intentionally used in manufacture of LuxeFilms® ScuffProof® Matte.

## HEAVY METALS AND SPECIFIC SUBSTANCES

LuxeFilms® ScuffProof® Matte complies with the requirements of:

- Directive 94/62/EC on Packaging and Packing Waste
- Norm EN 71 Safety of Toys Part 3 - Migration of certain elements.
- Directive 2011/65/EU (ROHS).
- The heavy metals limits set by the Coalition of Northwest Governors (CONEG)

Substances not intentionally used in the manufacture of LuxeFilms® ScuffProof® Matte are listed in the Annex 1a.

LuxeFilms® ScuffProof® Matte is generally suitable for food packaging under below mentioned circumstances.

Provided that the laminated side of the final product does not come directly into contact with food and provide that the product is used according to the information provided in the Technical Data Sheet and is correctly processed, we hereby confirm that LuxeFilms® ScuffProof® Matte will in principle allow compliance of the final product with the requirements of Regulation EU 1935/2004.

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- a) The coating of the above mentioned product is manufactured in compliance with the EuPia-GMP on "Good Manufacturing Practices for the Production Of Packaging Inks formulated for use on the non-food contact surfaces of food packaging and articles intended to come into contact with food (4th revised version, March 2016)".
- b) The above mentioned product is to be used by the customer in compliance with the EC Regulation 2023/2006 (GMP) and the EuPia Guideline "Printing Inks applied to the non-food contact surface of food Packaging materials and articles (Version of Nov. 2011, corr. July 2012)
- c) All materials which are used in the above mentioned product are listed in Annex 2 or in Annex of the Swiss ordinance on material and articles in contact with food (SR 817.023.21 Version- May 2017)
- d) The above mentioned product complies with the EuPia "Exclusion list for printing Inks and related products" (March 2016).
- e) Substances not intentionally used in the manufacture of the coating of the above mentioned product for food packaging applications are listed into Annex 1a and 1b.
- f) **Microwave application:** LuxeFilms® ScuffProof® Matte is in principle suitable for food packaging for microwave applications. However, due to the many different applications we recommend preliminary testing of the actual application.
- g) **Deep freeze application:** LuxeFilms® ScuffProof® Matte is in principle suitable for food Packaging for deep freeze applications. However, due to many different applications we recommend preliminary testing of the actual application.

Before the laminated packaging is brought into circulation, we recommend preliminary tests ensuring compliance with food law. Such preliminary tests should involve appropriate methods at an accredited test laboratory.

This confirmation of the usability of the LuxeFilms® ScuffProof® Matte for the manufacture of certain food packaging does not replace the declaration of conformity for the final packaging, which has to be issued by the packaging manufacturer.

REACH-REGULATION (EC) NO 1907/2006 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL OF 18 DECEMBER 2006 CONCERNING THE REGISTRATION, EVALUATION, AUTHORIZATION AND RESTRICTION OF CHEMICALS

The substances that are contained in our LuxeFilms® ScuffProof® Matte are either exempted according the Reach Article 2 or were (pre)-registered within the supply chain.

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## ANNEX 1

1a) Substances not intentionally use in LuxeFilms® ScuffProof® Matte

Substances	Cas#
Phthalates	n.a.
Mineral Oil	n.a.
Latex	n.a.
Azo Dyes	n.a.
Polybrominated Biphenyls (PBB)	n.a.
Polybrominated Diphenylethers (PBDE)	n.a.
Substances from genetically modified organism (GMO)	n.a.
Chlorinated solvents	n.a.
Products derived from animals	n.a.
Polyvinylchloride (PVC)	n.a.
Primary aromatic amines (PAA)	n.a.
Polycyclic aromatic Hydrocarbons (PAK)	n.a.
(per-)fluorinated substances	n.a.
NODGE (Novolac diglycidyl ether)	n.a.
Nonylphenole	n.a.
2-Isopropyl thioxanthone (ITX)	5495-84-1
4-Isopropyl thioxanthone (ITX)	83846-86-0

1b) Substances not intentionally use in LuxeFilms® ScuffProof® Matte

Substances mentioned in Annex 1 list 1a)	n.a.
Tartrazine	1934-21-0
2-Isopropyl thioxanthone (ITX)	5495-84-1
4-Isopropyl thioxanthone (ITX)	83846-86-0
2-Ethylhexyl-4-dimethylaminobenzoate(EHDAB)	21245-02-3
4-Methylbenzophenone (4-MBZ)	134-84-9
4,4'-Bis(dimethylamino)benzophenone (Michler's Keton)	90-94-8
Bisphenol-A (BPA)	80-05-7
Bisphenol-A- Diglycidylether (BADGE)	1675-54-3
Bisphenol-A- Diglycidyletherdiacrylate (BADGE-DA)	4687-94-9
Bisphenol-A- based raw material	n.a.
Bisphenol-F (BPF)	620-92-8
Bisphenol-F-Diglycidylether (BFDGE)	39817-09-9
Bisphenol-S based raw materials	n.a.
Benzophenone (BP)	119-61-9
2-Methylbenzophenone (2-MBZ)	131-58-8
Di-(2-ethylhexyl)phthalate (DEHP)	117-81-7
Di-n-butylphthalate (DBP)	84-74-2
Di-iso-butylphthalate(DBP)	84-69-5
Butylbenzylphthalate (BBP)	85-68-7
Di-iso-nonylphthalate (DINP)	28553-12-0
Di-iso-decylphthalate (DIDP)	26761-40-0
Di-n-octylphthalate (DNOP)	117-84-0
Titanium Acetylacetone (TAA)	17501-79-0

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2,4-Pentandion	123-54-6
Anthraquinone	84-65-1
N-vinyl caprolactam (NVC)	2235-00-9
Hexachlorobenzene	118-74-1
Dodecenyl-Succinic-Anhydride	25377-73-5
Anthracene	120-12-7
Naphthalene	91-20-3

## DISCLAIMER

The raw materials used in the manufacture of LuxeFilms® ScuffProof® Matte are technical raw materials and therefore do contain process-related additives and impurities. Therefore, the above specified confirmations are based on Material Data Sheets and other information which were made available to us by our suppliers. Additional laboratory tests were not conducted by us.

Any changes of the above-mentioned declarations which we are obliged to communicate we will communicate to our customers, accordingly.

The information and recommendations contained herein are based upon data believed to be up-to-date and correct. Nobelus® assumes no responsibility and disclaims all liability, if the damage is caused by improper use, unsuitable application purposes, and other parameters out of Nobelus® sphere of influence. In using our products, customers and users must comply with all applicable health and safety laws and regulations, in particular, customers are under obligation to carry out a risk assessment for the particular work places, a safety assessment under the (EU) food contact legislation and to adequate risk management measures. Although this material may have direct and/or indirect food safety certification(s), Nobelus® facilities do not claim to carry any food safety certifications.

The confirmation is valid from the date of issue and replaces all previous versions of this document, thereby invalidating them.

By following the above mentioned regulations, Nobelus® has fulfilled our duty of care regarding the conformance of the products we supply with legislation governing food contact applications. It is the responsibility of the user to test the suitability of our products for the intended application. We accept no liability for losses arising from inadequate suitability of our products for the food medium being used by you.