

**Declaration of Conformity for goods**  
**Processed or repacked by AKO in bags smaller than**  
**20 kg (laminated film, rigid films, side and bottom sealed**



***Below please find in parts and extracts the declaration of conformity which we obtained from our supplier of the a.m. packaging material Our supplier confirmed us in his latest declaration of conformity, dated 11th December 2018, for all products which we process and pack in our company (in bags of 20-25 kg) the following:***

- BRC Global Hygiene Standard for (food) packaging and other packaging materials  
→ A hygiene-, cleaning- and pest control concept is implemented. The production of our packaging materials is effected according to the preconditions of the (good manufacturing practice, GMP) Regulation 2023/2006/EC, especially concerning the detection of potential hazards, evaluation of risks in connection with those and a system to govern recognized hazards (chemical, physical and micro-biological risks according to HACCP) for the usage with foodstuffs.

We ordered random for many supplied types microbiological tests according to method § 64 LFGB on mesophilic aerobic bioburden 30°C (incl. pathogenic germs), yeast, as well as mold fungus. "As defined by LFGB and EC Regulation 1935/2004 there are no objections to the intended use of the tested article".

- „(Deutsches) Lebensmittel- und Futtermittelgesetzbuch“ (§ 64 LFGB), especially §§ 30 and 31 (foodstuffs law) Regulation 178/2002/EC
- (packaging and packaging waste) Directive 94/62/EC, including (modification-) Directives 2004/12/EC and 2005/20/EC →no heavy metals cadmium (Cd), lead (Pb), mercury (HG) and hexavalent chromium, (Cr<sub>6+</sub>) (limit value < 100 ppm)
- (REACH) Regulation (EC) No **1907/2006** including (modification-) Regulation (EC) No 1272/2008/EC and European Chemicals Agency (ECHA) candidate list valid at the time → no substances of very high concern (SVHC) (limit value < 0,1 mass percent)
- (materials in contact with foodstuffs/ framework ) Regulation **1935/2004/EC**, especially article 18. Traceability is ensured due to labels with our corporate letterhead and our charge number in relation with the carton-/ roll number!
- (traceability and labeling of genetically modified organisms/ GVO-) Regulations 1829/2003/EC and (not subject to) 1830/2003/EC as well as Regulation (EU) No 1169/2011 (allergens)→ no ingredients subject to labeling (limit value < 0,5%)
- (recycled plastic-) ordinance 282/2008/EC
- (plastic-) Regulation (EU) No **10/2011** including (modification-) Regulation (EU) No 1183/2012, 202/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/213, 2018/831 and following
- „Bedarfsgegenstände-Verordnung“ (BedGgstV), including (modification-) Regulation 17
- Specifications of the respectively relevant recommendations of “Bundesinstitutes für Risikobewertung” (BfR) part A (e.g. III for polyethylene, VII for polypropylene, X for polyamide)
- Enamels and coatings conform to the Europe Euro resolution AP(2004)1 and the FDA 21 CFR.
- **EuPIA**-guideline for printing inks not intended to come in direct contact with foodstuffs, April 2008, and the excluding list for raw materials for printing inks, October 2007 (issued by: CEPE Conseil European de L’Industrie des Peintures, of the Encres d’Imprimerie et des Couleurs d’Art, Brussels  
→ The must not be direct contact between printing ink and foodstuffs!  
→ UV-curing printing inks are not used resp. our packaging materials are free of photoinitiators from the TDI groups in terms of benzophenone (BP), 4-Hydroxybenzophenone, 4-Methylbenzophenone (4-MBP), 2,2-Dimethoxy-2-phenylacetophenone and Isopropylthioxanthone (ITX)!  
→ Opinion delivered by our suppliers on nanoparticles / nanotechnology in printing inks and printing auxiliaries: „Pigments, filler and polymer dispersions are constitutional components of printing inks. The size of the particles embedded in the printing ink matrix is in the range between 0.01 and 5 µm. This is the range of the large nano- and the smaller submicroparticles. These particles are entirely coated by the binders for printing inks. Due to that fact dust particles do not get released neither during the processing nor from the printed printing ink which possibly could get inhaled. In regard of nanoparticles the content of nanoparticles in printing inks- and coatings

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is of no importance for the risk analysis of packaging and other printed products. This information is based on the current state of our knowledge and experience.“

- The glues used meet in their composition the specifications of FDA 21 CFR § 175.105 as well as the recommendation XXVIII of the BfR. The completely cured glue meets the specifications of the guideline 2002/27/EC including the above mentioned change directive saying that the content of primary aromatic amines in foodstuffs shall be beyond the detection limit value of 0,01 mg/kg foodstuffs (expressed as aniline).

**Conformity was determined by:**

- Examinations of the migration and residual content according to Regulation (EU) No 10/2011. The legal limit values of global migration (GM) and specific migration be complied with the following storage and test conditions.
- suppliers confirmations and/ or calculations

**Recommended storage conditions**

Storage in closed rooms at 18 to 25 °C with humidity between 40 and 56% relative humidity.

Not to be stored directly on the floor or at walls or heating units.

To be brought into the packing room 24 hours before usage and opened just before processing.

**Specification for intended usage or limitations:**

- Types of foodstuffs intended to come in contact with the material:

<b>dry</b>	e. g. spices
<b>watery</b>	e. g. fresh meat
<b>sour</b>	e. g. sour preserves
<b>fatty</b>	e. g. sausages and meat products

- Types of foodstuffs not intended to come in contact with the material:

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- Duration and temperature of processing and storage with contact with foodstuffs:

HBX-types with Antifog:

- Suitable for heating (pasteurization) up to 80 °C for 20 minutes
- Suitable for long term storage at room temperature and below
- Suitable for freezing up to -18 °C

HBX-types without Antifog:

- Suitable for heating (pasteurization) up to 70 °C for 2 hours
- Suitable for heating (pasteurization) up to 80 °C for 1 hour
- Suitable for heating (pasteurization) up to 85 °C for 45 minutes
- Suitable for long term storage at room temperature and below
- Suitable for freezing up to -18 °C

- Relation of surface in contact with foodstuffs to the volume according to with conformity with the material was determined:

6 dm<sup>2</sup> film per 1 kg foodstuffs

**The level of migration stays within the legal limits subject to the following test conditions:**

Food simulant	Abbreviation	testing conditions (time/ temperature)
10 % ethanol (v/v) (alternatively distillated water or 50 % (v/v) ethanol)	A (D1)	10 days at 40°C
3 % acetic acid (w/v)	B	10 days at 40°C
Vegetable oil (olive oil)	D2	10 days at 40°C
<b>Alternative:</b>		
95 % ethanol (v/v) isooctan	D2	10 days at 40°C 2 days at 20°C

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**Specific migration limits (SML) and maximum residue levels (QM) resp. (QMA):**

PM Ref.-Nr. Ref. No	CAS-Nr. CAS No	Bezeichnung des Stoffs Substance name	Grenzwert specific migration limit [mg/kg]	
10060	0000075-07-0	Acetaldehyd = acetaldehyde	SML(T)=6	
10090 30000	0000064-19-7	Essigsäure = acetic acid (E260)	-	
10120	0000108-05-4	Vinylacetat = acetic acid, vinyl ester	SML=12	
11710	0000096-33-3	Methylakrylat = acrylic acid, methyl ester	SML(T)=6	
12786	0000919-30-2	3-Aminopropyltriethoxysilan = 3-aminopropyltriethoxysilane	SML=0,05	
13326 15760 47680	0000111-46-6	Diethylenglykol = diethyleneglycol	SML(T)=30	
13380 25600 94960	0000077-99-6	1,1,1-Trimethylolpropan = 1,1,1-trimethylolpropane	SML=6,0	
14200 41840	0000105-60-2	Caprolactam = caprolactam	SML(T)=15	
14230	0002123-24-2	Caprolactam, Natriumsalz = caprolactam, sodium salt	SML(T)=15	

16600	0005873-54-1	Diphenylmethan- 2,4 -diisocyanat = diphenylmethane-2,4'-diisocyanate	SML(T)=NN	1 mg/kg im Enderzeugnis, berechnet als NCO
16630	0000101-68-8	Diphenylmethan-4,4'-diisocyanat = diphenylmethane-4,4'- diisocyanate	SML(T)=NN	1 mg/kg im Enderzeugnis, berechnet als NCO
16990 53650	0000107-21-1	Ethylenglykol = ethyleneglycol	SML(T)=30	
18430	0000116-15-4	Hexafluorpropylen = hexafluoropropylene	SML=NN (NG=0,01)	ND = NN = nicht nachweisbar
18460 15274	0000124-09-4	Hexamethylendiamin = hexamethylenediamine	SML=2,4	
18640	0000822-06-0	Hexamethylendiisocyanat = hexamethylene diisocyanate	SML(T)=NN	1 mg/kg im Enderzeugnis, berechnet als NCO
18820	0000592-41-6	1-Hexen = 1-hexene	SML=3	
19150	0000121-91-5	Isophthalsäure = isophthalic acid	SML(T)=5	
19243 21640	0000078-79-5	2-Methyl-1,3-butadien = 2-methyl-1,3-butadiene	SML=NN	ND = NN = nicht nachweisbar
19540 64800	0000110-16-7	Maleinsäure = maleic acid	SML(T)=30	
19960	0000108-31-6	Maleinsäureanhydrid = maleic anhydride	SML(T)=30	
22660	0000111-66-0	1-Octen = Octene-1	SML=15	
23651 80800	0025322-69-4	Polypropylenglykol = polypropyleneglycol	-	
24550 89040	0000057-11-4	Stearinsäure (als Zinksalz) = stearic acid	SML=5 als Zn	
25120	0000116-14-3	Tetrafluorethylen = tetrafluoroethylene	SML=0,05	
25150	0000109-99-9	Tetrahydrofuran = tetrahydrofuran	SML=0,6	
25210	0000584-84-9	2,4-Toluoldiisocyanat = 2,4-toluene diisocyanate	SML(T)=NN	1 mg/kg im Enderzeugnis, berechnet als NCO

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25240	0000091-08-7	2,6-Toluoldiisocyanat = 2,6-toluene diisocyanate	SML(T)=NN	1 mg/kg im Enderzeugnis, berechnet als NCO
25960	0000057-13-6	Harnstoff = urea	-	
26140	0000075-38-7	Vinylidenfluorid = vinylidene fluoride	SML=5	
31920	0000103-23-1	Bis(2-ethylhexyl)adipat, Diethylhexyladipat (DEHA) = adipic acid, bis(2-ethylhexyl) ester	SML=18	
34230	-	Alkyl(C8 -C 22)sulfonsäuren = alkyl(C8-C22)sulphonic acids	SML=6	
34560	0021645-51-2	Aluminiumhydroxid = aluminium hydroxide	-	
35760	0001309-64-4	Antimontrioxid = antimony trioxide	SML=0,04	
38560	0007128-64-5	2,5-Bis(5-tert-butyl-2-benzoxazolyl)thiophen = 2,5-bis(5-tert-butyl- 2-benzoxazolyl)thiophene	SML=0,6	
38820	0026741-53-7	Bis(2,4-di-tert-butylphenyl) pentaerythritoldiphosphite = bis(2,4-di- tert-butylphenyl) pentaerythritol diphosphite	SML=0,6	
39090	-	N,N-Bis(2-hydroxyethyl)alkyl(C8-C18)amin = N,N-bis(2- hydroxyethyl)alkyl (C8-C18)amine	SML(T)=1,2	
39120	-	N,N-Bis(2-hydroxyethyl)alkyl (C8 -C18)aminhydrochlorid = N,N-bis(2-hydroxyethyl)alkyl (C8-C18)amine hydrochlorides	SML(T)=1,2	
39815	0182121-12-6	9,9-Bis(methoxymethyl)fluoren = 9,9-bis(methoxymethyl)fluorene	SML=0,05	
40000	0000991-84-4	2,4-Bis(octylthio)-6-(4-hydroxy-3,5-di-tert-butylanilino)-1,3,5-triazin = 2,4-bis(octylmercapto)-6-(4-hydroxy-3,5-di-tert-butylanilino)- 1,3,5-triazine	SML=30	
40800	0013003-12-8	4,4'-Butyliden-bis(6-tert-butyl-3-methylphenyl-ditridecylphosphit) = 4,4'-butylidene-bis(6-tert-butyl-3-methylphenyl-ditridecyl phosphite)	SML=6	
42080	0001333-86-4	Kohlenstoffschwarz (Toluollösliche Substanzen < 0,1 %) = carbon black	SML = 60	
46640	0000128-37-0	2,6-Di-tert-butyl-p-kresol (= BHT) Butylhydroxytoluol = 2,6-di-tert- butyl-p-cresol (E321)	SML=3	
52720	0000112-84-5	Erucamid = Erucamide	-	
68320	0002082-79-3	Octadecyl-3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionat = octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	SML=6	
68400	0010094-45-8	Octadecyl-erucamid = octadecyl-erucamide	SML=5	
68960	0000301-02-0	Oleamid = oleamide	SML=60	
74400	0026523-78-4	Phosphorsäure, Tris(nonyl-und/oder dinonylphenyl)ester = phosphorous acid, tris(nonyl-and/or dinonylphenyl) ester	SML=30	
74640	0000117-81-7	Phthalsäure, Bis(2-ethylhexyl)ester = phthalic acid, bis(2- ethylhexyl) ester	SML=1,5	
74880	0000084-74-2	Phthalsäure, Dibutylester = phthalic acid, dibutyl ester	SML=0,3	
80000	0009002-88-4	Polyethylenwachs = polyethylene wax	-	
83595	0119345-01-6	Reaktionsprodukt von Di-tert-butylphosphonit mit Biphenyl, erzeugt durch Kondensation von 2,4-Di-tert-butylphenol mit dem Friedel- Crafts-Reaktionsprodukt aus Phosphortrichlorid und Biphenyl = reaction product of di-tert-butylphosphonite with biphenyl, obtained by condensation of 2,4-di-tert-butylphenol with Friedel Craft reaction product of phosphorous trichloride and biphenyl	SML=18	
85360	0000109-43-3	Dibutylsebacat = sebacic acid, dibutyl ester	SML(T)=60	
88640	0008013-07-8	Sojabohnenöl = soybean oil, epoxidisiert, epoxidiert Oxiran < 8 %, Jodzahl/ iodine number < 6	SML=60	
92560	0038613-77-3	Tetrakis(2,4-di-tert-butylphenyl)- 4,4'-biphenylen-diphosphonit = tetrakis(2,4-di-tert-butyl-phenyl)- 4,4'-biphenylene diphosphonite	SML=18	
93760	0000077-90-7	Tri-n-butylacetylcitrat = tri-n-butyl acetyl citrate	SML(T)=60	
95360	0000276-62-6	1,3,5-Tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazin- 2,4,6(1H,3H,5H)-trion = 1,3,5-tris(3,5-di-tert-butyl-4- hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	SML=5	
95859	-	Raffinierte Wachse, die aus Erdöl oder aus synthetischen Kohlenwasserstoffen gewonnen werden, hohe Viskosität = waxes, refined, derived from petroleum based or synthetic hydrocarbon feedstocks, high viscosity	PAA = NG=0,02 / Kohlenstoff-Zahl = < 25 / < 5 Gew.-%	
96240	0001314-13-2	Zinkoxid = zinc oxide	SML(T)=5 als Zn	



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-	0010402-16-1	Ölsäure, Kupfersalz (Kupferoleat) = oleic acid, copper salt (copper oleat)	SML = 5	
-	0025791-96-2	Propoxyliertes Glycerin = propoxylated glycerin	-	
-	0031694-55-0	Ethoxyliertes Glycerin = Glycerol ethoxylate		

**Ingredients being subject to restrictions regarding their use in foodstuffs („Dual Use Additives“):**

PM/ Ref.-Nr. Ref. No	CAS-Nr. CAS No	Bezeichnung des Stoffs Substance name	Grenzwert specific migration limit [mg/kg]	
13620 40320	0010043-35-3	Borsäure = boric acid, expressed as boron (E284)	SML(T)=6	
14680 44160	0000077-92-9	Citronensäure = citric acid (E330)	-	
23170 72640	0007664-38-2	(Ortho)Phosphorsäure = phosphoric acid (E338)	QM=NWG=1	
23590 76960	0025322-68-3	Polyethylenglycol = polyethyleneglycol (E1521)	-	
30610 30612	0001592-23-0	Natrium-, Kalium, Calcium-Salze der Speisefettsäuren (z.B. Calciumstearat) bzw. Alkalisalze der Fettsäuren = Sodium, potassium and calcium salts of fatty acids (E471 / E470a / E470b)	-	
30960	-	Ester von aliphatischen Monocarbonsäuren (C6 -C22) mit Polyglycerin = acids, aliphatic, monocarboxylic (C6-C22), esters with polyglycerol (E475)	-	
42500	0000471-34-1	Kohlensäure, Salze bzw. Calciumcarbonat (weiß) = carbonic acid, salts (E170)	-	
46640	0000128-37-0	2,6-Di-tert-butyl-p-kresol (= BHT) Butylhydroxitoluol = 2,6-di-tert-butyl-p-cresol (E321)	SML=3	
56486	-	Ester von Glycerin mit aliphatischen gesättigten geradkettigen Säuren mit geradzahlig Kohlenstoffkette (C14-C18) und mit aliphatischen ungesättigten geradkettigen Säuren mit geradzahlig Kohlenstoffkette (C16-C18) bzw. Mono- und Diglyceride von Speisefettsäuren = glycerol, esters with acids, aliphatic, saturated, linear, with an even number of carbon atoms (C14-C18) and with acids, aliphatic, unsaturated, linear, with an even number of carbon atoms (C16-C18) (E471)	-	
80077	0068441-17-8	Oxidierter Polyethylenwachs = polyethylene waxes, oxidised (E914)	60	
86240	0007631-86-9	Siliciumdioxid bzw. Kieselsäure (E551) = Synthetic silica (SiO2)	-	
91200	0000126-13-6	sucrose acetate isobutyrate = Saccharoseacetat-isobutyrat (E444)	-	
92080	0014807-96-6	Talkum bzw. Magnesiumsilikathydrat = talc (E553b)	-	
93440	0013463-67-7	Titandioxid (weiß) = titanium dioxide (E171)	-	
-	0000557-34-6 0005970-45-6	Zinkacetat = Zinc acetate (E 650)	-	
-	0005858-81-1	Pigment Red 57:1 / Litholrubin BK = Litholrubine BK (E180)	-	
-	0007429-90-5	Aluminium (E173)	-	

The user shall verify himself that the above listed types are suitable for the intended food to be packed beyond the stipulations of the Regulation.

Kindly note that we do not give any guaranty for the data given above.

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