

Statement of Composition of the following Printing Inks

EXC30000MY STERABOARD UV FOOD OFFSET INKS

Used in the Manufacture of Food Packaging

Regulation (EC) No 1935/2004¹ requires that materials and articles which, in their finished state, are intended to be brought into contact with foodstuffs or which are brought into contact with foodstuffs, must not transfer any components to the packed foodstuff in quantities which could endanger human health, or bring about an unacceptable change in the composition or deterioration in organoleptic properties. This means that the manufacturer of the finished article and the filler have the legal responsibility that the food packaging is fit for its intended purpose.

Provided that our products listed above are used according to the information given in the Technical Data Sheet and correctly processed, and provided that the food packaging is designed in a way that there is no intended direct food contact with the print, we hereby confirm that our products will in principle allow compliance of the final product with Regulation 1935/2004.

- 1) The products listed above are formulated in such a way as to minimise potential migration through the substrate or the set-off from the printed outer side to the food contact surface in the stack or the reel, having taken into account the purpose for which they have been designed. Note that set-off and migration are also dependent on the processing conditions and sufficient barrier properties of the substrate.
- 2) The products listed above are manufactured in accordance with the EuPIA „Good Manufacturing Practices“ (GMP) Printing inks for food contact materials (GMP, Regulation (EC) No 2023/2006²).
Toyo Ink Europe's manufacturing location is qualified to ISO 9001.³

1 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, OJEU L338 of 13.11.2004

2 Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practices for material and articles intended to come into contact with food. OJEU L384 of 29.12.2006

3 ISO 9001 International Standard for Quality Management Systems

- 3) This series does not contain in their formulations toxic heavy metals such as Cadmium, Lead, Mercury or Chromium (VI).
The total amount of heavy metals, present because of inevitable technical pollution, stays below 100 ppm (= 0,01% by weight). As a consequence, it is far below the European norm for Toys for children EN71/3, or the American counterpart ASTM F 963-95 (secs. 4.3.5.1– 4.3.5.2 and 8.2.–8.3.), or the CONEG-legislation, and the inks and varnishes conform to the European resolution AP(96) 5 (which is the logic result of the German BgVV recommendation IX) and the European Directive 2004/12/EC.
- 4) Furthermore, the inks and varnishes comply with the limitation on vinylchloride, i.e. the restriction to produce products that contain more than 25 mg/kg PCB or PCT (dated 18/7/89). At last, these products conform to RoHS Directive 2002/95/EC (and its amendment 2004/19/EC), concerning the flame retardants (PBBs and PBDEs).
- 5) Based on information provided by raw material suppliers, printed packaging manufactured using the products listed above will contain the following substances:

Substances used or known to be present with the potential to migrate, including indication whether the substances are restricted under the scope of the Plastics Regulation (EU) No 10/2011, the Swiss Ordinance 817.023.21 Annex 1 or 10 or listed on the 'Provisional List of Additives used in Plastics' or listed as a food additive in Regulation (EC) No 1333/2008 and Regulation (EC) No 1334/2008:

| CAS-No | PM/FCM Ref-No | Name | Restrictions and specific migration limits (SML) [mg/kg] | | On Provisional List of Additives Used in Plastics [yes/no] | Regulation (EC) No 1333/2008 [yes/no] | For non-volatile/non-reactive substances: Maximum amount in dried ink film [%] | Comments |
|------------|---------------|------|--|--|--|---------------------------------------|--|----------|
| | | | Regulation (EU) No 10/2011 | Swiss Ordinance 817.023.21 [either "SML" or "part B."] | | | | |
| 14807-96-6 | 92080/615 | Talc | (60) | (60) | No | Yes | 5 | |

(60 mg/kg food) = Default Migration Limit for evaluated substances when no specific restriction is published

Primary Aromatic Amines⁴ (PAA)

with Restrictions in COMMISSION REGULATION (EU) No 10/2011 Annex II (2) as unavoidable impurities possibly present in certain types of pigments (if used in the product):

- In other inks according to WCC⁵ the sum of PAA in the ink is below 100 ppm (for offset inks).
- PAAs that may potentially exceed the detection limit of 0.01 mg/kg food are listed in the table hereunder per ink number:

⁴ Note for Caution: in applications where higher temperatures are applied (e.g. such as retort) PAAs may be formed due to partial decomposition of the pigments. In case the printed packaging to be used in such applications, the printer shall inform the ink supplier, who may recommend specific inks and supply specific information on request.

⁵ Worst Case Calculation has been based on the EU cube model and the 10 ppb limit will not be exceeded.

| INK number | CAS-No PAA | Name PAA | Restrictions and specific migration limits (SML) [mg/kg] | | On Provisional List of Additives Used in Plastics [yes/no] | Regulation (EC) No 1333/2008 [yes/no] | For non-volatile/non-reactive substances: Maximum amount in dried ink film [%] | Comments |
|------------|------------|-------------------------------|--|--|--|---------------------------------------|--|----------|
| | | | Regulation (EU) No 10/2011 | Swiss Ordinance 817.023.21 [either "SML" or "part B."] | | | | |
| EXC30062MY | 118-88-7 | p-Toluidine-o-sulfonic acid | | | No | No | | |
| EXC30913MY | 99-56-9 | 4-Nitro-1,2-phenylene diamine | | | No | No | | |
| EXC30921MY | 95-54-5 | 1,2-Phenylenediamine | | | No | No | | |
| EXC30931MY | 106-50-3 | 1,4-Phenylenediamine | | Part B. | No | No | | |
| | 95-82-9 | 2,5-Dichloroaniline | | | No | No | | |
| EXC30933MY | 636-30-6 | 2,4,5-Trichloroaniline | | Part B. | No | No | | |
| EXC30940MY | 118-88-7 | p-Toluidine-o-sulfonic acid | | | No | No | | |

Metals with Restrictions

in COMMISSION REGULATION (EU) No 10/2011 Annex II:

The product may contain substances listed in Annex II (1) to the Plastics Regulation (EU) No 10/2011. Such substances are shown in the data table only if the migration of these substances from the final article could exceed the limits specified in the Plastics Regulation⁶.

This information is provided to allow other members of the packaging chain to assess compliance in regard to the Framework Regulation (EC) No 1935/2004, and/or the Plastics Regulation and/or the Swiss Ordinance.

The information may only be used for this purpose. This document must be treated as confidential and must not be transmitted to third parties without prior consent.

⁶ Exception: **Only** in applications where the ink / varnish is printed on paper or board **and** where analyses are performed which are significantly deviating from the methods described in COMMISSION REGULATION (EU) No 10/2011 (e.g. extraction method with cold water), the printer shall inform the ink supplier, who may recommend specific inks and supply specific information on PAAs that may potentially be present.

Disclaimer

The information contained herein is based upon data believed to be up-to-date and correct at the time of writing. It is provided to our customers (and/or Analytical Contractors) in order that they are able to comply with all applicable health and safety laws, regulations, and orders. In particular, customers are under an obligation to carry out a risk assessment under relevant Good Manufacturing Practices (GMP) in-line with EU food contact legislation and as a result take adequate risk management measures to protect food consumers.

Since the application and conditions of use are beyond our control, the information provided does not represent a guarantee of any kind for the final printed product. The product's performance and its suitability for the customer's purpose depend on the particular conditions of use and the material being printed. We recommend that customers satisfy themselves that each product meets their requirements in all respects before commencing a print run. There is no implied warranty of merchantability or fitness for purpose of the product or products described herein.

Date: 06/01/2020

Signature:

Address:

