Trader/ Producer/ Supplier — Rolf Bayer Vacuumverpackung GmbH
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Manufacturing / Distribution of — laminated films, rigid films,
vacuum-bags-, side- and bottom- sealed shrink-bags
– all films and bags printed and unprinted –

		Valid for all sizes!	
Type	**Shrink bags "CBRE 50" unprinted**		

The Rolf Bayer Vacuumverpackung GmbH confirms you as our customer that the above-mentioned packaging materials (types) comply with following regulations:

- BRC/IoP Global Hygiene Standard for packaging and other packaging materials
  → You will find the most recent certificate on our webpage www.rbayer.de !
  → 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 microbiological 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^{6+}) (limit value < 100 ppm)
- "Verpackungs-Verordnung" (VerpackV), including (modification-) ordinance 5
- (**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 and following
- „Bedarfsgegenstände-Verordnung“ (BedGgstV), including (modification-) Regulation 17
- Specifications of the respectively relevant recommendations of “Bundesninstitutes 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 Coleurs 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 Isopropylthioxanthon (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 contend of nanoparticles in printing inks- and coatings 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).
- → Starch-flour not containing wheat or gluten components resp. powder made of (a mixture of) tapioca- and/ or potato-based starches are used for specific types of packaging materials and neither contain allergens (listed in Regulation (EU) No 1169/2011) nor genetically modified organisms and are for that reason appropriate for the usage in foodstuffs.

Conformity was determined by:

- Examinations of the migration and residual content according to (migrations-) Directive 82/711/EWG, including (modification-) Directive 93/8/EC and 97/48/EC as well as (simulants-) Directive 85/572/EWG, including (modification-) Directive 2007/19/EC and 2008/39/EC until 31.12.2015 and Regulation (EU) No 10/2011 as of 01.01.2016.
  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° Celsius 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.

Warranty and changes of characteristics

We confirm for our packaging materials a minimum storage life of 12 months.
The characteristics assured, especially the barrier characteristics, remain unchanged for a period of 12 months – subject to correct storage, treatment and application.
Certain characteristics may deteriorate or changes considerably over that period of time, among those are in particular antifog (6 months) or anti static, but as well the surface tension.

Specification for intended usage or limitations:

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

  dry e. g. spices
  watery e. g. fresh meat
  sour e. g. sour preserves
  fatty e. g. sausages and meat products

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

  - See details in our technical data sheets (specifications).

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

  10 days at 40° Celsius tested

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

  6 dm² film per 1 kg foodstuffs

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

Descriprion of food *	**Test number****	**Contact time in days [d] at Contact temperature in [°C] ******	**Intented food contact conditions**	**Food simulanz**
All type of foods	OM2	10 d at 40 °C	Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.	Acetic acid 3 % (w/v)
All type of foods	OM2	10 d at 40 °C	Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.	10 % ethanol (v/v) (alternatively distillated water or 50 % (v/v) ethanol)
All type of foods	OM2	10 d at 40 °C	Any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes.	Vegetable oil

Specific migration limits (SML) and maximum residue levels (QM) resp. (QMA)
For the packaging material types mentioned above that are the following substances:

PM/ Ref.-Nr. **Ref. No**	CAS-Nr. **CAS No**	Bezeichnung des Stoffs **Substance name**	Grenzwert **specific migration limit** [mg/kg]	berechnet mit dem für Folien und Beutel üblichen Umrechnungs-faktor 6 **calculated with the usual for films and bags conversion factor of 6** [mg/kg]	relevant für **relevant for**	
10120	000108-05-4	Vinylacetat = acetic acid, vinyl ester	SML=12	2,00		
11710	000096-33-3	Methylakrylat = acrylic acid, methyl ester	SML(T)=6	1,00		
20020	000079-41-4	Methacrylsäure = methycrylic acid	SML(T)=6	1,00		
22660	000111-66-0	1-Octen = Octene-1	SML=15	2,50		
26110	000075-34-4	Vinylidenchlorid = vinylidene chloride	QM = 5 in BG oder SML = NN (NG = 0,05)	ND = NN = nicht nachweisbar		
68320	002082-79-3	Octadecyl-3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionat = octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	SML=6	1,00		
88640	008013-07-8	Sojabohnenöl = soybean oil, epoxidised, epoxidiert Oxiran < 8 %, Jodzahl/ iodine number < 6	SML=60	10,00		

Ingredients being subject to restrictions regarding their use in foodstuffs („Dual Use Additives“) according to the guidelines 95/31/EC, 95/45/EC and 96/77/EC:
For the packaging material types mentioned above that are the following substances:

PM/ Ref.-Nr. **Ref. No**	CAS-Nr. **CAS No**	Bezeichnung des Stoffs **Substance name**	Grenzwert **specific migration limit** [mg/kg]	berechnet mit dem für Folien und Beutel üblichen Umrechnungs-faktor 6 **calculated with the usual for films and bags conversion factor of 6** [mg/kg]	relevant für **relevant for**	
46640	000128-37-0	2,6-Di-tert-butyl-p-kresol (= BHT) Buthylhydroxitoluol = 2,6-di-tert-butyl-p-cresol (E321)	SML=3	0,50		

The information about additives which are at the time foodstuffs additives and flavor additives („Dual Use Additives“) are based on our current state of knowledge. As there is no official list of the „Dual Use Additives“ we refer to „EUPC Study on Dual Use Additives; PACK Co. srl, Milan 2006, which is incomplete. The lacking information about this group of additives from certain subcontractors, which are facing the same difficulties as we do, does not allow us to guarantee the completeness of our information.

The guidelines 82/711/EWG and 85/572/EWG (including modification guidelines) provide a code of practice for the selection of the test conditions to be used for various foodstuffs. Up to 31.12.2015 has been tested according to this test. As of 01.01.2016 the test conditions of Regulation (EU) no. 10/2011 apply. According to such our packaging materials meet the requirements of those guidelines under consideration of the stated foodstuffs contact conditions for the packaging of dry, watery, or sour filling goods or such containing alcohol or fat. The user is obliged to make sure that our packaging materials are suitable for the respective filling good. For that reason we cannot assume liability for damages caused by lacking suitability or inappropriate usage of our products for the used filling good.

No harmful substances were used knowingly. However, we cannot exclude the possibility of traces of certain substances which entered our packaging material in some other way, like for instance via ubiquitous environment impact, contaminations or residues of catalysts or process aids.
You will be informed about any changes of the composition of our packaging materials relevant for foodstuffs requirements. This declaration of conformity is valid without modification until 30. June 2018.

Veitsbronn, 2rd November 2017

Rolf Bayer Vacuumverpackung GmbH

Christian Frericks / Head of Quality Management