



Conformity Declaration

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Hereby we declare that our solvent-free lamination adhesive with trade names Lamtec SL 110A/210B have a composition that complies with the following requirements for food contact packaging applications.

- 1. Commission Regulation (EU) No 10/2011 and its successive amendments up to 23 September 2020 including Regulation (EU) 2020/1245
- 2. Regulation (EC) No 1935/2004 and its amendment up to 20 June 2019 and including Regulation (EU) 2019/1381
- 3. Commission Regulation (EC) No 2023/2006 and its amendment up 27 March 2008and including Commission Regulation (EC) No 282/2008 (GMP for materials and articles intended to come into contact with food)
- 4. Commission Directive 2002/72/EC and its amendment up to 19 October 2009 including Commission Regulation (EC) No 975/2009
- 5. Code of Federal Regulations , FDA Section 21 CFR 175.105 and its amendment up to 20 Jul 2022

According to Paragraph (30) Commission Regulation (EU) No 10/2011, Coatings, printing inks and adhesives are not yet covered by a specific EU legislation and therefore not subject to the requirement of a declaration of compliance. However, for coatings, printing inks and adhesives to be used in plastic materials and articles adequate information should be provided to the manufacturer of the final plastic article that would enable him to ensure compliance for substances for which migration limits have been established in this Regulation.

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The responsibility for compliance with the specific conditions is with the converter and not with the adhesive supplier.

However we analyzed some samples of flexible packaging structures laminated with Lamtec adhesive after fully completion of its curing and all of them are comply with aforementioned EU and FDA regulations.

OVERALL MIGRATION:

EUROPEN UNION:

The analysis results is shown that the laminated flexible packaging samples comply with the Commission Regulation (EU) No 10/2011 and its successive amendments up to 23 September 2020 including Regulation (EU) 2020/1245.

Reference	Food Simulant	Abbreviation
	Acetic acid 3 % (w/v)	Simulant B
EU	Vegetable oil	Simulant D2
	Ethanol 50 % (v/v)	Simulant D1

■ authorized maximum limits defined in EC Directive 2002/72/E and EU Regulation 10/2011:

- For aqueous simulants: 10 mg/dm² with an analytical tolerance 2 mg/dm²
- For fatty simulants: 10 mg/dm² with an analytical tolerance 3 mg/dm²

SPECIFIC MIGRATION:

Chemical Substance	Food Simulant	Abbreviation	SML (mg/kg)
PAAs (primary aromatic amines)	Acetic acid 3 % (w/v)	Simulant B	0.002

This Declaration is valid starting from the issue date, and will be modified in the case of significant modification in our products formula structure or in the case of legislation amendments

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