

Statement of Compliance FCM

AtéCé Graphic Products

Molenwerf 14
1911 DB UITGEEEST
The Netherlands

Date: 05-12-2022
Version: V23 GB
Product: Galaxy Coating WB3600

To whom it may concern,

AtéCé Graphic Products BV (hereafter referred to as "AtéCé") certifies that the aforementioned product complies with the following rules and standards as follows:

1. AtéCé holds ISO9001:2015 certificate
2. The product is manufactured in compliance with general and detailed rules on good manufacturing practice as defined by European Printing Ink Association (EuPIA) resulting from the Commission Regulation (EC) No 2023/2006.
3. The product complies with the EuPIA exclusion list of commodities for print colors and related products as well as the following regulations:
 - a. The amount of lead, chromium and mercury falls according to the information we received from the raw material manufacturers below the total maximum threshold of 100ppm given by Directive 94/62/EC (packing and wastage). Hence a conformity relating to the requirements on toys by German Standards Institute (DIN) EN-71-3 it's amendment 2019 + A1: 2021 and CONEG Model Toxics Legislation is given. Please note the ink or coating manufacturer cannot take the responsibility for the compliance of the finished toy(s).
 - b. Regulation (EC) No 1895/2005 concerning the restriction of use of certain epoxy derivatives.
 - c. Council directive 78/142/EEC, relating to materials and articles which contain vinyl chloride monomer and are intended to come into contact with foodstuffs.

4. According to the information of our raw material manufactures we can state that in the properly dried form the polymers used in the formulation of this product will comply with FDA Guideline 21CFR176.180 (Components of paper and paperboard in contact with dry food).

According to the information of our raw material manufactures we can state that the polymers used by us and our raw material suppliers find compliance, in the properly dried coating form, to FDA Guideline 21CFR176.170 (Components of paper and paperboard in contact with aqueous and fatty food) with the following limitations:

For use only in contact with foods of types IV-A, V and VII in table 1 of paragraph (C) 21CFR176.170, under use conditions E through G in table 2 of paragraph (C) 21CFR176.170, and with foods of types VIII and IX without use temperature restriction.

5. According to the information of our raw material manufactures suppliers the product does not contain the following substances:

- Substances listed in Annex XVII to REACH and the previous legislation, Directive 76/769/EEC
- Persistent Organic Polutants (POPs) as described in Annex I of Commission Regulation (EU) No 757/2010 amending Regulation (EC) 850/2004
- Substances listed in point 6 of this statement
- Animal derived content
- Genetical Modified Organism (GMO)

6. According to the information provided by AtéCé's raw material suppliers the product does not contain the following substances:

- Chlorinated-, brominated- or fluorinated Hydrocarbons
- Halogenated Hydrocarbons
- Mineral Oil Saturated Hydrocarbons (MOSH)
- Mineral Oil Aromatic Hydrocarbons (MOAH)
- Phthalate Plasticisers (including DEHP, DBP, BBP, DINP, DIDP and DNOP (**))
- Naphthalene Plasticisers
- N-Methylpyrrolidone
- PVC, PVdC and Chloride derivatives
- PAK's (Polycyclic Aromatic Hydrocarbon)
- Formaldehyde
- SVHC (Substances of very high concern) Regulation (EC) 1907/2006 (substances presented at the most recent list on the internet:- <https://echa.europa.eu/candidate-list-table>)
- o-Nonylphenol, o-Phenyphenol (and it's salts) (**)
- Organotin compounds (**)
- Bor- or. Boroacid derivatives
- Nano particles or nano technology
- Paraben (**)

- PFAS (Per- and polyfluoroalkyl substances)
- PFOA (Perfluorooctanoic acid)
- PFOS (Perfluorooctanesulfonic acid)
- POSH (Polyofin Oligomeric Saturated Hydrocarbons)
- PTFE (Polytetrafluoroethylene)
- FTOH (Fluorotelomer alcohols)
- PFC (Perfluorcarbonic acid)
- ITX (Isopropylthixantone)
- Benzophenone
- 4-Methyl Benzophenone
- Hydroxy Benzophenone
- 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone
- 2-dimethylamino-2-(4-methyl-benzyl)-1-(4-morpholin-4-yl-phenyl)-butan-1-one
- 2-ethylhexyl-4-dimethylaminobenzoate (EHA)
- Palm oil
- Natural and Artificial latex
- Flame retardants
- Synthetic UV-Filters (Benzophenone-1, Benzophenone-2, Benzophenone-3, 3-Benzylidene camphor, 4-methylbenzylidene camphor, 4,4-dihydroxybenzophenone, Ethylhexyl methoxycinnamate (**))
- Primary Aromatic Amines
- Bisphenol A (BPA), B, F and S (**)

However any or all of the above may be present at background trace levels as they would naturally be found to occur in the environment

7. According to the information of our raw material manufactures suppliers the product does not contain endocrine disruptors as intentionally added substance. See section 6 items marked **(**)** are Listed and suspected as Endocrine Disruptor
8. According to the information of our raw material manufactures we can state that the Polymers and formulations used by us and our raw material suppliers find compliance, in the properly dried coating form, table 5 (Exclusion List of Solvents) and table 6 (Minimize list for Solvents) with Nestlé Guidance Note (version 10-2018).
9. All raw materials currently used in the product listed above are included in the list (Annex 1 or 6) of the Swiss Ordinance 817.023.21 on Materials and Articles in Contact with Food¹.

AtéCé Graphic Products BV

¹ Ordinance on Materials and Articles in Contact with Food: "Verordnung des EDI vom 7. März 2008 (AS 2008 1061)" SR 817.023.21

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Disclaimer

Regulation (EC) No 1935/2004 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 it is fit for its intended purpose.

The selection of raw material follows substantially the recommendations of the Federal Institute for Risk Assessment (BfR), the Federal Office of Consumer Protection and Food Safety (BVL) and the U.S. Food and Drug Administration (FDA). Therefore it may be assumed, that a print product manufactured by using the product meets the requirements of Regulation (EC) No 1935/2004, if the product has been used according to the technical data sheet or comparable technical information and by applying a state of the art production technique and a design of the food package that ensures that the print (ink and varnish) does not come into contact with the food.

Food packaging are made from several components (in addition to substrates like paper, board or plastics; printing inks, coatings, adhesive and other additives are used). Substances of all these components may interact with each other as well as with the food. The possibility of a migration and deterioration of characteristics of food does not only depend on the composition of the product, but of the additionally used components and printing conditions (such as printing speed and temperatures) as well. The components and printing conditions are determined by the manufacturer of the final packaging and are not subject to the control of AtéCé.

It is in the responsibility of the manufacturer of the final packaging and of the manufacturer of the final article to ensure that no substances from the packaging are transferred to food in quantities large enough to endanger human health or to bring about an unacceptable change in the composition of the food or a deterioration in its organoleptic properties. The verification of compliance with legal provisions may only be proven at the final product, the printed and/or coated food packaging. The manufacturer of the final article bears the responsibility for that final article is suitable for its intended use as food packaging.

The preceding information shall support the manufacturing of safe food. The information is given to the best knowledge on basis of the current state of knowledge and depends to some extent on statements and analysis of third parties (e.g. laboratories, providers of commodities); AtéCé does not assume any liability for the correctness of the statements and analysis of third parties. The statement of compliance does not discharge customers and the manufacturer of the packaging from observing all applicable laws, provisions and instructions concerning health and safety, especially not from performing a risk assessment of the particular place of work and a safety assessment regarding food contact as well as the maintenance of a risk management system.