

Statement of Composition of the following
Printing Ink/Coating/Varnish
Sheetfed Offset Ink series SunPak FSP EcoPace
(FEPxx, FEBnn)
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 to ensure that the food packaging is fit for its intended purpose.

Provided that our product listed above is 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) Sun Chemical's products are formulated and manufactured in accordance with the "EuPIA Guideline on Printing Inks applied to Food Contact Materials" [see EuPIA website for the full guideline].
- 2) The product listed above is manufactured in accordance with the EuPIA "Good Manufacturing Practices (GMP): Printing Inks for Food Contact Materials". Sun Chemical's manufacturing locations are qualified to ISO 9001.²
- 3) Based on information provided by raw material suppliers, printed packaging manufactured using the product listed above will contain the following substances: ***[note: all substances used or known to be present with the potential to migrate]***

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, OJ EU L338 of 13.11.2004

² ISO 9001 International Standard for Quality Management Systems

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 10 or listed on the 'Provisional List of Additives used in Plastics' or listed as a food additive or food flavourant in Regulation (EC) No 1333/2008 or Regulation (EC) No 1334/2008.

CAS No.	FCM No.	Name	Restrictions and specific migration limits (SML) [mg/kg]		On Provisional List of Additives Used in Plastics	Regulations (EC) No 1333/2008 or 1334/2008	Maximum amount in dry ink [%]	Comments
			Regulation (EU) No 10/2011	Swiss Ordinance 817.023.21				
N/A	10	Acids, C2-C24 aliphatic, linear, monocarboxylic, synthetic and their mono-, di- and triglycerol esters	60	60	30612		37	
1333-86-4	411	carbon black	60	60	42080		19	Non-migratory
1234986		Pigment Red 57:1		60		E180	18	Non-migratory
N/A	879	Acids, fatty (C8-C22) from animal or vegetable fats and oils, esters with linear alcohols, aliphatic, monohydric, saturated, primary (C1-C22)	60	60	31336		16	
1332-58-7	410	kaolin	60	60	62720, 43490	E559	11	Non-migratory
9007-13-0	741	resin acids and rosin acids	60	60			5	
77-90-7	138	tri-n-butyl acetyl citrate	60	60	93760	9.511	2	
65997-06-0	717	rosin, hydrogenated	60	60	84420, 84210		1	
9002-88-4	549	polyethylene wax	60	60	80000		0.8	

Primary Aromatic Amines³ (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): analyses of samples of yellow inks indicated presence of the following primary aromatic amines (PAA) - covered by Annex II (2) to the Plastics Regulation (EU) No. 10/2011: o-Toluidine (CAS No. 95-53-4), 2,4-Di-Methyl-Anilin (2,4-DMA; CAS No. 95-68-1) and 3,3'-Di-Chloro-Benzidine (3,3'- DCB; CAS No. 91-94-1), but only in levels (concentration in sum), that it is guaranteed, that these PAA are not released in amounts above the detection limit of 2 ppb - as specified in the Annex II (2) to the Plastics Regulation (EU) 10/2011.⁴

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 Regulation³. 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.

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.

February 2024

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³ Note for Caution: in applications where higher temperatures are applied (e.g. such as retort) PAA 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

⁴ 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 PAA that may potentially be present.