



## Declaration of Compliance:

### Legal compliance - Products with agreed Food Contact

This is to certify that the products from VPK Packaging AS fulfil the requirements of food law subject to appropriate use.

The products fulfils the relevant requirements of:

- EC Regulation 1935/2004
- Industry Guideline for the compliance of Paper & Board material and articles for food contact
- EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles

Corresponding Declarations of Compliance from our suppliers to classify our packaging as suitable for food are present and are being updated on an ongoing basis.

According to these Declarations of Compliance, it can be concluded that the following packaging groups can be used for dry and non-greasy food or foodstuffs that are shelled, peeled or washed before consumption.

- Corrugated board with brown testliner inside
- Corrugated board with white top testliner inside

It can also be concluded that the following packaging groups can be used with moist<sup>1</sup> (non-acidic), dry non-fatty food as well as foodstuffs that are shelled, peeled or washed before consumption.

- Corrugated board with kraftliner inside
- Corrugated board with high performance liner inside
- Corrugated board with white top kraftliner inside
- Corrugated board with coated white top kraftliner inside

*Note 1: It is the responsibility of the packer/filler to verify the suitability and compliance with applicable legislation of the total food packaging system for its intended end-use application.*

*Note 2: In the year 2017 Peterson A/S has ordered a test for Total migration on boxes for fatty food, which was approved by the external test laboratory. There are no values exceeding the limits set by legislation (EU) No 10/2011.*

*Food can only have contact with the non-printed side of the board.*

To provide you with legally binding certification we would have to conduct an analysis of every single product you receive from VPK Packaging A/S, containing every ingredient of this packaging. This would be at your expense.

<sup>1</sup>A barrier might be needed for technical reasons to protect the paper from physical deterioration.



#### Legal compliance - Other

The products fulfils the relevant requirements of the Essential requirements of European and Council Directive 94/62/EC on packaging and packaging waste and its amendments laid down in Article 9 and Annex II, and specifically that:

- Heavy Metals

The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium is below 100 ppm.

Date: 2021-08-19

A blue ink signature of Øjvind Christensen, written in a cursive style.

**Øjvind Christensen**  
Quality Manager



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<sup>1</sup>A barrier might be needed for technical reasons to protect the paper form physical deterioration.



## PFAS declaration

Denmark has taken a new regulation in force banning the use of PFAS:

**BEK nr 681 af 25/05/2020**

### **Extract (translated):**

#### Paper and cardboard

§ 8. Paper and cardboard paper and cardboard contact materials using per- and polyfluorinated alkylated substances (PFAS) must not be placed on the market.

Section 2. regardless of section 1, paper and cardboard food contact materials in which per- and polyfluorinated alkylated substances (PFAS) are used, may be placed on the market if a functional barrier is in use, preventing migration of the substances to the food.

*Note: The functional barrier efficiency must though be proven/tested/verified*

**We hereby confirm that PFAS is not used in any of the supplied products from Peterson packaging.**

#### **Note:**

- We cannot guarantee zero mg organic fluorine/g paper as we do not have teste data.
- Furthermore, the Danish legislation does not require "zero content" but sets an indicative limit value of 20 ug organic fluorine/g paper.
- As we do not use PFAS in our production we do not expect our products to be above the limit.

**Date: 2021-01-13**

A handwritten signature in blue ink, appearing to read 'Øjvind Christensen', written over a light blue horizontal line.

**Øjvind Christensen**

QHSE Manager

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## Declaration of compliance to REACH

### Duty to provide SVHC information to customers (REACH Candidate list)

The European Union directive 1907/2006/EC, Reach article 33, includes a duty to provide information to European customers about Substances of Very High Concern (SVHC) that exceed 0,1% in an article, which applies to each article incorporated as a component in a complex product. For example, a bicycle tyre is a component of the complex product bicycle.

This definition was determined in the judgment of the Court of Justice of the European Union in 2015 September 10, Case C-106/14. Chemical tests and reports must be set up in accordance with this judgment.

See page 3 and explanations in Guidance from the European Chemicals Agency:

<https://echa.europa.eu/en/-/guidance-on-requirements-for-substances-in-articles>

When the product / article contains **SVHC > 0,1% weight/component**, the details is specified in the SVHC table below.

Product name and/or VPK Packaging A/S article no	Component containing SVHC	Substance name	Cas no	Amount %
None				

### Information to consumers

The SVHC noted in the table will be registered in the SCIP database that is handled by the European Chemicals Agency (ECHA). SCIP stands for Substances of Concern In articles as such or in complex objects (products) and is established under the Waste Directive (2008/98/EC). This ensures that the information on SVHC in products is available throughout the whole lifecycle, to both waste operators and consumers.

### Compliance confirmation

By signing this Declaration, we, VPK Packaging A/S hereby confirm that our products, including packaging materials, manufactured for or distributed to VPK Packaging A/S, do not contain any Substances of Very High Concern (SVHC) in amounts greater than 0,1 % in weight/component.

Any exceptions to this confirmation are listed in the SVHC table on the previous page.

SVHC are listed in the Reach Candidate list that is updated twice/year. If these updates, or material changes in the supply chain, lead to reporting obligations, we will inform our customer immediately.

We further confirm that our products and packaging do not contain any substances or usages that are prohibited in the European Union directive 1907/2006/EC, Reach.

Date: 2021-03-02

  
Øjvind Christensen  
QHSE Manager