



VPK Packaging NV
Kareelstraat 108 9300 Aalst



DECLARATION OF CONFORMITY

This declaration is valid for all corrugated board and solid board packaging produced at the VPK Packaging NV sites listed below and intended for the packaging of foodstuffs (the "Packaging"). Solid board products are marketed under the brand name "Smart Packaging Solutions" (SPS).

Production sites:

Corrugated board

VPK Packaging
Oude Baan 120 9200 Dendermonde

VPK Packaging Erembodegem
Zuid 3 Industrielaan 13 9320 Erembodegem (Aalst)

Solid board

Smart Packaging Solutions Dendermonde
Oude Baan 120 9200 Dendermonde

Smart Packaging Solutions Meer
Europastraat 28 2321 Meer

Section I: Declaration

VPK Packaging NV declares that all Packaging conforms to the regulations and recommendations in force, as listed in Section II of this Declaration of Conformity.

The Packaging may therefore come into direct contact with dry, non-fatty or permanently deep-frozen food and foodstuffs that must be shelled, peeled or washed before consumption. All foodstuffs may be packed indirectly in all of the Packaging, provided that a suitable primary packaging is used as a buffer. Direct contact with fatty foods is possible if an appropriate liner is used as an inner liner or a suitable coating is applied to the inner liner. For example, in specifically chosen liners, the PE layer is suitable for direct contact with dry, moist, acidic, deep-frozen or fatty foods.

This declaration is only valid insofar as the Packaging is correctly used, which implies the following:

- during storage before use, protect against moisture and extreme temperatures (recommendation: between 30% and 70% RH and +5 to +25°C) and use as packaging within six months after the production date where possible; and
- only use for intended use and subject to compliance with the following restrictions:

- flash freezing possible up to - 45°C;
- cold storage possible up to -25°C;
- never thaw items in the boxes;
- never use for hot dishes.

Section II: Argumentation and Documentation

II. A. All liners conform to the requirements and recommendations regarding purity, migration and organoleptic integrity as laid down in:

- Regulation (EU) 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, consolidated version dated 27/03/2021;
- Belgian Royal Decree of 11 May 1992 on materials and articles intended to come into contact with foodstuffs (the total migration in all paper types is < 60 mg per 6 dm²/kg of food);
- German BfR (Bundesinstitut für Risikobewertung) recommendation XXXVI. "Paper and board for food contact", version dated 01/04/2022;

- Italian Ministerial Decree of 21/03/1973 – “Disciplina igienica degli imballaggi, recipienti, utensili, destinati a venire in contatto con le sostanze alimentari o con sostanze d’uso personale”;
- Industry guidelines: “Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles” – version dated March 2019 (ACE, CCB, CITPA, ETS, ECMA, FEFCO).

II. B. The composition of the recycled paper materials conforms to, and has been communicated in accordance with, standard NBN EN 643 (2014). The proportions of pre-consumer and post-consumer sources are known.

Section III: Analyses

The following specific analyses are performed every two years in external, ISO 17025 accredited laboratories:

- specific migration tests on all paper types with additional attention to current points of concern;
- migration tests linked to printing on representative 100% flexo printed boxes in corrugated board and solid board and offset for solid board;
- biocide residue analysis on corrugated board samples with the highest relative glue content.

All results confirm that there are no objections to employing these materials as described in Section I of this Declaration of Conformity.

Suppliers of all paper and cardboard types and PE-coated materials, and suppliers of relevant auxiliary agents, are systematically requested to provide all available documents regarding their position on food safety and their traceability. Regarding PE-paper: the raw material suppliers confirm that those raw materials used in the Packaging comply with the requirements and recommendations for packaging materials that are used for articles or parts of articles intended to come into contact with food pursuant to Regulation (EU) 10/2011. All reports and documents will be provided on request.

Section IV: Additives

VPK Packaging NV does not use bisphenol A in the production of Packaging and thus complies with the French “Loi n° 2010-729 du 30 juin 2010 modifiée par la loi n°2012-1442 du 24 décembre 2012”.

In the processes, VPK Packaging NV also does not use or add:

- anthraquinone;
- phthalates;
- Total Organic Fluorine (TOF);
- active and/or intelligent materials;
- substances that are only permitted in paper and cardboard behind a functional barrier.

Section V: Certification

The four VPK Packaging NV production sites listed above have been BRC/IOP certified since 2005 and BRC Global Standard Packaging Materials certified since April and May 2016 (currently version VI) and thus comply with the management requirements as laid down in Regulation (EU) 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, consolidated version dated 17/04/2008.

This Declaration of Conformity is valid for two years unless changes occur earlier.

Aalst, 2 June 2022.

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