

Declaration of compliance for articles intended to come into contact with food

1 issuer of the Declaration of compliance

Lacers GmbH
Friedrich-Olbrich-Damm 62
13627 Berlin

2 General provisions

We confirm, that the materials and articles listed below are suitable as food packaging.

Tradename	Material	Item no.
Ziplock bags, flatbags, sliderbags	LDPE	

The materials and articles supplied comply with the requirements of the following legal regulations (in each case including all amend-ments and in the version that is valid at the date of issue of this declaration):

- Regulation (EC) No. 1935/2004 [1]
- Regulation (EC) No. 2023/2006
- Regulation (EC) No. 10/2011
- Regulation (EC) No. 2007/19/EO
- Regulation (GMP) No. 282/2008
- Regulation No. EG 850/2004 79/117/EWG

[1] The material complies with the relevant requirements of the framework Regulation. Information about compliance testing with the applicable regulations are given in chapter 7. If necessary, tests are delegated, for which the user is responsible.

3 Plastics

☐ Not applicable

The plastic materials and articles including adhesives, printing inks and coatings supplied comply with the Plastics Regulation (EU)10/2011 including all amendments and in the version that is valid at the date of issue of this declaration.

4 Description of application

Lebensmittel <i>Food</i>	Behandlung, mit Lebensmittelkontakt (Worst Case) <i>Treatment in contact with food (worst case)</i>	Lagerung, mit Lebensmittelkontakt (Worst Case) <i>Storage in contact with food (worst case)</i>	Verhältnis Kontaktfläche zu Füllmenge <i>Ratio food contact surface/ volume</i>	Geeignet <i>suitable</i>
wässrige (hydrophile) Lebensmittel: <i>aqueous (hydrophilic) foods</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis zu 15 Minuten lang / <i>heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes</i>	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long term storage at room temperature or below</i>	≤ 6 dm ² / kg	☒
saure Lebensmittel (pH < 4,5): <i>acidic foods (pH < 4,5)</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis zu 15 Minuten lang / <i>heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes</i>	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long term storage at room temperature or below</i>	≤ 6 dm ² / kg	☒
alkoholische Lebensmittel (≤ 20%) und Lebensmittel mit erheblichem Gehalt an organischen Inhaltsstoffen: <i>alcoholic foods (≤ 20 %) and foods which contain a relevant amount of organic ingredients</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis zu 15 Minuten lang / <i>heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes</i>	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long term storage at room temperature or below</i>	≤ 6 dm ² / kg	☒
Öl-in-Wasser-Emulsionen und alkoholische Lebensmittel (> 20%): <i>oil in water emulsions and alcoholic foods (> 20 %)</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis zu 15 Minuten lang / <i>heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes</i>	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long term storage at room temperature or below</i>	≤ 6 dm ² / kg	☒
fettige (lipophile) Lebensmittel: <i>fatty (lipophilic) foodstuffs</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis zu 15 Minuten lang / <i>heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes</i>	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long term storage at room temperature or below</i>	≤ 6 dm ² / kg	☒
trockene Lebensmittel: <i>dry foods</i>	Erhitzung auf 70 °C bis zu 2 Stunden lang oder Erhitzung auf 100 °C bis	Langzeitlagerung bei Raumtemperatur oder darunter / <i>long</i>	≤ 6 dm ² / kg	☒

	zu 15 Minuten lang / heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes	term storage at room temperature or below		
--	--	---	--	--

infants and young children (< 3 years) when ratio food contact surface/
volume corresponds to the above-specified ratio

☐ nein / no ☒ ja / yes

repeated use

☒ nein / no ☐ ja / yes

5 Migration and residual amounts according Regulation (EU) No. 10/2011

Inspections of the migration and residual contents results are regularly repeated, in order to guarantee that the limiting values are permanently maintained. If the determined migration values are close to the limit, frequent (and short term) repetitions of the measurements will be carried out. The measurements are carried out according to the current legal requirements. For plastics or plastic layers in multi-material multi-layer the tests are carried out according to Regulation (EU) 10/2011.

7.1 Overall migration (OM)

7.1.1 Test conditions for migration tests

food simulant	test conditions (time/ temperature)	tested
A: Ethanol 10 Vol.-% / ethanol 10% (v/v)	10d / 40°C	☒
B: Essigsäure 3 Gew.-% / acetic acid 3% (w/v)	10d / 40°C	☒
C: Ethanol 20 Vol.-% / ethanol 20% (v/v)	10d / 40°C	☐
D1: Ethanol 50 Vol.-% / ethanol 50% (v/v)	10d / 40°C	☐
D2: Pflanzliches Öl / vegetable oil	10d / 40°C	☒
E: Poly(2,6-diphenyl-p-phenylenoxid) (Tenax ®) / poly(2,6-diphenyl-p-phenylene oxide)	10d / 40°C	☐

7.1.2 result

The overall migration limit of 10 mg/dm² packaging is met under the test conditions specified above.

7.2 Specific migration

7.2.1 Test conditions for migration test

Lebensmittelsimulanz / food simulant	Prüfbedingungen (Zeit/Temperatur) test conditions (time/ temperature)	durchgeführt tested
A: Ethanol 10 Vol.-% / ethanol 10% (v/v)	10d / 60°C	☒
B: Essigsäure 3 Gew.-% / acetic acid 3% (w/v)	10d / 60°C	☒
C: Ethanol 20 Vol.-% / ethanol 20% (v/v)	10d / 60°C	☐
D1: Ethanol 50 Vol.-% / ethanol 50% (v/v)	10d / 60°C	☐
D2: Pflanzliches Öl / vegetable oil	10d / 60°C	☒
E: Poly(2,6-diphenyl-p-phenylenoxid) (Tenax ®) / poly(2,6-diphenyl-p-phenylene oxide)	10d / 60°C	☐
Sonstige (bitte angeben) / others (please specify):		☐

In particular cases worst case test conditions compared to the test conditions given above or screening approaches could be accepted for compliance testing in accordance with Annex V of Plastic Regulation (EC) No 10/2011.

7.2.2 list of substances contained with restrictions and/or specifications according Regulation (EC) no 10/2011

Stoff / Substance	FCM-Nr. / FCM no.	CAS-Nr. / CAS no.	Grenzwert / Limitation [mg/kg] / [mg/dm ²]

For the products listed in section 4, we use materials of different suppliers that contain various substances with limitations. These sub-stances are fully included in the list. Since traceability is ensured at all times, on demand we will give you more information about the substances which are contained in the products supplied to you.

7.2.3 list of substances not listed in Regulation (EC) no 10/2011 including NIAS- non intentionally added substances



not applicable as materials not regulated by Regulation (EU) 10/2011 (including amendments) are not covered.



The list of contaminants and degradation products (NIAs non intentionally added substances) is based on information provided by the supplier.



The list of contaminants and degradation products (NIAS- non intentionally added substances) is based on on an 10 ppbScreening with the following methods (e.g. GC/MS-FID, HPLS/MS, ICP, HS-GC/MS). Please specify method:

If the material contains components which are not listed in the positive list of Regulation (EU) 10/2011 (e.g. (additivessolvents, catalysts, monomers, etc.)), they comply with any national provisions applicable to these materials and articles e.g. the Federal Institute for Risk Assessment (BfR) recommendations or FDA regulations.

Substance	Basis of valuation	CAS no.	Limitation
no use of non evaluated substances (behind a functional barrier)			

7.2.4 result

The restrictions for evaluated substances (SML, QM, QMA, ND) in the union list of Regulations (EU) 10/2011 are met under the testconditions given above. Migration

The migration of non evaluated substances behind a functional barrier is not detectable at a detection limit of 0,01 mg/kg food or foodsimulant.

The restrictions of other non evaluated substances regarding migration or composition according basis of valuation given above aremet.

For the evaluation of the specific migration the migration test results with simulant D2 have been divided by the following correction fac-tor according annex V no 4.2 (DRF) of Regulation (EU) No 10/2011:

7.3 list of additives with a limitation in food ("dual use" additives - food additives or flavorings listed in Regulations (EC) No 1333/2008 and/or (EC) No 1334/2008 and its implementing measures)

☒ Not applicable, "dual use" additives are not contained (please list).

6 mineral oils MOSH (mineral oil saturated hydrocarbons) and MOAH (mineral oil aromatic hydrocarbons)

The material is free of mineral oils MOSH (mineral oil saturated hydrocarbons) and MOAH (mineral oil aromatic hydrocarbons) and is packaged and stored under conditions that no mineral oil MOSH (mineral oil saturated hydrocarbons) and MOAH (mineral oil aromatic hydrocarbons) can be absorbed in amounts above the limit of the draft of the 22nd amendment of the German Consumer Goods Ordinance from 07/24/2014. According to this draft the maximum levels for mineral oil hydrocarbons should be limited in paper, paperboard or cardboard intended to come into contact with food, which are produced using recycled pulp with 24 mg MOSH / kg packaging and 6 mg MOAH / kg packaging (packagings for dry and non-fatty foods: C16 - C25, all other foods C16 - C35).

The material we deliver is a polyolefin product, which contains oligomeric saturated hydrocarbons which are called POSH (polyolefine oligomeric saturated hydrocarbons), for differentiation from mineral oil MOSH (mineral oil saturated hydrocarbons). Chemically MOSH and POSH are the same but may differ in molecular weight distribution and thus in the chromatographic retention area. Therefore in an analysis of polyolefin-based films hydrocarbons may be found, which are not based on mineral oil. The migration of POSH is according to current knowledge usually evaluated by the overall migration limit which is met for this material. The migration of hydrocarbons will be assessed by the legislature and we expect that a lower limit will be adopted. Whether this will also apply for oligomeric saturated hydrocarbons, is not known. MOAH (mineral oil aromatic hydrocarbons) are not added according to information provided by the supplier during the production of this product.

7 other tests

9.1 organoleptic

Sensory tests have not been performed. Therefore we remind you that the manufacturer of the finished food contact material or article must verify that the finished material or article does not modify the organoleptic properties of the food.

Since food can differ widely in its composition we remind you that the manufacturer of the finished food contact material or article must verify that the finished material or article does not modify the organoleptic properties of the food.

9.2 heavy metals

The material is free from heavy metals according to directive 94/62/EC (amendments 2004/12/EC, 2005/20/EC and 2013/2/EU included)

The Declaration of compliance was developed by means of supplier confirmations and / or calculations, examinations of the migration and residual content values by certified laboratories acc. Regulation 10/2011.

The user must convince himself of the suitability for the intended filling material that goes beyond the tasks listed above.

Traceability across all production levels is guaranteed via batch number and roll number.

Berlin, 01.01.25

Place / Date / Signature

Lacers GmbH

Friedrich-Olbricht-Damm 62

D-13627 Berlin

www.lacers.de