

Declaration of Compliance

PRODUCT

Name:

THERMAL PAPER

Description:

Top-coated thermal paper with back barrier. Excellent resistance to scratching, grease, solvents, water and plasticizers. Phenol free.

This declaration of compliance is valid for all the paper's grammages.

FOOD CONTACT COMPLIANCE

This information is based on the declarations of our suppliers as well as on the results of the tests performed by accredited external independent laboratories. Raw materials have been selected for compliance and are suitable according to the risk assessment of starting materials.

The product is suitable for contact with such kind of food which are washed, shelled and/or peeled before consumption, at temperature up to 40°C for a short period of time.

The product complies with the last update of the following norms:

- **European Parliament and Council Commission Regulation (EC) 1935/2004**, of 27 October 2004 on materials and articles intended to come into contact with foodstuffs for the intended food contact applications and conditions mentioned above , and repealing Directives 80/590/EEC and 89/109/EEC.
- **Commission Regulation (EC) No 2023/2006 of 22 December 2006**: The product is manufactured according to good manufacturing practice for materials and articles intended to come into contact with food.
- **German Lebensmittel- und Futtermittelgesetzbuch (LFGB)** on food contact paper and board for the intended food contact applications and conditions mentioned above .
- **Commission Regulation (EU) No 10/2011**: The product is a paper, as monomaterial, so this Regulation does not apply to it, as it is not plastic. However, migration tests have been carried out based on the migration limits or SMLs set out in Regulation 10/2011.
- Analytical tests regarding **Italian national regulation Decreto Ministeriale** of 21 March 1973.

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- Analytical tests regarding **Danish Order No. 681** of 25 May 2020, including confirmation of the absence of PFAS in paper and cardboard.

Within the European Union there is a mutual recognition principle. A product complying with food contact material regulation of one member state, can be brought to market in all member states.

Legislation not assessed:

- **Swiss Ordinance SR 817.023.21 of the FDHA** on materials and articles intended to come into contact with foodstuffs.
- **Canadian Food and Drugs Act** or any other Canadian legislation.
- **Japan Food Sanitation Act**, 1947; Article 18, Section III Apparatus and containers/packages, for indirect food contact end uses.
- **MHLW Guideline** for Safety Assurance in the manufacture of food utensils, container and packaging: GMP in Japan.
- **GB 9685-2016** or any other Chinese legislation.
- **ANVISA / Mercosur food contact legislation.**

DUAL ADDITIVES

No dual-use additives (additives that are also authorized as food additives or food flavorings) have been identified in the product that may migrate into food, or be out of compliance with any restrictions set out in Regulation 1333/2008/EU on food additives, as amended, or Regulation 1334/2008/EU on flavorings, as amended, but we confirm that some have been used in its manufacture:

E Number	Dual additive	CAS Number
E - 170	Calcium carbonate	1317-65-3
E - 466	Carboxymethyl cellulose (CMC)	9004-32-4
E - 559	Kaolin	1332-58-7
E - 1203	Polyvinyl alcohol (PVA)	9002-89-5

OTHERS

- **Regulation Reach 1907/2006/EC** concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals:

This product does not contain any of the substances listed in the latest update of the SVHC (Substances of Very High Concern) list and does not contain any of the substances included in annex XIV and annex XVII of this Regulation, over a limit of 0.1% (w/w).

- **Commission Regulation (UE) 2024/3190** on the use of Bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food:

This product doesn't contain Bisphenol A (BPA) or Bisphenol S (BPS).

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- **Regulation PPWR (UE) 2025/40, CONEG and TPCH:**

The product complies the analytical safety testing regarding total content of heavy metals, according to the Packaging and Packaging Waste Regulation, that replaces the European Parliament of the Council Directive 94/62/EC on packaging and packaging waste and its subsequent amendments like Directive 2018/852, Regulation (EU) 2019/1020 and the Directive 2019/904.

The product also complies with the Model Toxics in Packaging Legislation of CONEG (Coalition of Northeastern Governors) and TPCH (Toxics in Packaging Clearinghouse).

The sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr (VI)) in packaging or packaging components shall not exceed 100 ppm by weight.

The product has not been manufactured using intentionally added PFAS.

DISCLAIMER

This document is intended to share food contact information for the product mentioned above and in any case constitutes any warranty. This document and its contents are subject to modification as a result of regulatory changes or applicable amendments.

The printer and the final manufacturer is responsible for ensuring that packaging or labeling constructions in which the product is used as a component is acceptable for their intended application, and complies with any applicable legislation and/or test requirement for the finished article. It is the responsibility of the manufacturer of the final packaging or article to verify the suitability of the product for its use and foreseen conditions. Also to (i) ascertain compliance with the overall migration limit (OML) as well as specific migration/safety limits (where applicable), and (ii) confirm compliance with Article 3.1(c) of the Framework Regulation prohibiting the alteration of the organoleptic characteristics of the food.

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