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## Food Contact Status Declaration

This statement applies to all AquaPAL® & ThermoPAL® products sold with the intention of manufacturing food packaging.

It is the policy of Pafra Adhesives Ltd (PAL) to develop, manufacture and sell products of high and consistent quality in accordance with our own and our Customers' requirements. The Company's Quality Management System is documented in the Operating Processes that are contained in a Quality System Manual and in other records referred to therein. As one would expect we are certified according to DIN ISO9001:2008, a copy of our certificate is available upon request.

Our adhesives are produced in compliance with FEICA (association of European adhesives and sealants manufacturers) guidelines set out for all stages of manufacture, processing and distribution of adhesives and sealants intended for food contact materials in relation to EU regulations EC No 1935/2004 (GMP, traceability & article 3) and EC no 2023/2006 (GMP).

There is no specific legislation for adhesives and therefore legally we cannot supply a declaration of conformance to EC No 1935/2004 as outlined in article 16 which is only for article 5 materials.

Our approach is to use raw materials that are certified to comply with either EC No 10/2011 Article 5 (The Union List), German recommendation BfR XIV or are food additives. Information on substances with SML, SML(T) and any specific restrictions are stated below. Information on dual use additives, if food additive or flavouring substance, that have a restriction in food is also noted.

Where it is not possible to use an essential additive that is not listed in the above articles then a risk assessment in accordance with internationally recognised scientific principles as to suitability for use in food packaging has been undertaken. This procedure takes into account compliance status with other national legislations of EU member states (Warenwet, Italian Ministry 21/3/72 etc.), recommendations such as EFSA opinions, BfR recommendations, Council of Europe Resolutions and Non-EU legislation (FDA CFR 21, Swiss Ordinance).

AquaPAL® Poly vinyl acetate and Poly ethylene vinyl acetate based adhesives contain less than 500mg/Kg of vinyl acetate (most of which evaporates on drying). The SML (Specific Migration Limit) of vinyl acetate is 12mg/Kg which applies to the finished article. Adhesives specifically designed for detection via blue UV sensors contain 2,5-bis(5-tert-butyl-2-benzoxazolyl)thiophene which has a specific migration limit of 0.6mg/Kg. Adhesives specifically designed for detection via green UV sensors contain 8-Hydroxypyrene-1,3,6-trisulfonic acid which has a specific migration limit of 0.1mg/Kg. A limited number of our highest adhesion products contain a small quantity of polymer made from ethyleneimine which has an SML of 0.01mg/Kg Not Detectable. This polymer is used extensively in the paper/board manufacturing industry. Besides these four substances Pafra do not use any materials with specified SML or SML(T) as outlined in the annex of EC No 10/2011.

Plasticised products generally contain E-1518 (Triacetin CAS 102-76-1) at levels up to 10 % by weight. According to EU No 1130/2011 E-1518 is permitted in food stuffs up to a level of 3000mg/Kg (0.3%).



Pafra Adhesives Ltd's registered office: 145-147 St John Street, London, EC1V 4PY.  
The Company is registered in England: No.644949 and for VAT, registration: No. GB 250 4895 54

With regards to ThermoPAL® range of products the table below lists the monomers and other substances which may contribute to the migrations, if the plastic regulation (EU) 10/2011 mentions specific limits or if they are subject to other restrictions. All substances listed in the plastic regulation without any SML value are covered by compliance with the overall migration and do not require additional monitoring.

Substance	Regulation 10/2011 Restriction/ Limit	Typical Composition (weight %)	FDA compliance	BfR
Petroleum hydrocarbon resin	No restrictions	< 65 %	175.105, 175.300 (b)(3)(xxi), 175.320, 176.170, 176.180, 177.2600, 177.1210, 175.125	BfR III, VII, XXV, XXXV-A
White mineral oil	No restrictions	< 25 %	172.878, 178.3620 (a)	-
Antioxidant / Preservative	No restrictions	< 1 %	175.105, 175.125, 175.300 (b)(3)(xxi), 175.320 (b)(3), 176.170 (a)(5), (b)(2), 176.180, 177.1210, 177.2470(b)(1), 177.1680(b)(2), 178.3800, 178.3850	BfR XXI, XXV, XXXIX
SIS polymer	OM <10mg/dm2 (Isoprene) QM = 1mg/kg in FP or SML = ND (DL = 0.02mg/kg)	< 20 %	175.105(c)(5), 175.125, 175.300(b)(2), 175.320(b)(2), 176.170(a)(4), 176.180(b)(2), 177.1210, 177.2600(c)(3), 177.17810(b)(2)	-

Our packaging adhesives do not contain any phthalates of any description, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE) nor any substance of very high concern as defined in article 57 of regulation EU No. 1907/2006 ("the REACH regulation") at an individual concentration limit of  $\geq 1.0\%$  or  $\geq 0.1\%$  for persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) substances.

Pafra does not directly add any heavy metal containing chemicals to any of its products. We do not routinely analyse our products for their heavy metal content, however, where we have had analysis carried out in the past for Lead, Mercury, Cadmium and Chromium (total), we have found levels were less than 10 ppm. For example analysis of a representative Pafra adhesive tested for extractable heavy metals are shown below, all are very close to the minimum level of detection for each element.

Extractable Lead expressed as	Pb 1mg/kg	(1.0ppm)
Extractable Mercury expressed as	Hg less than 1mg/kg	(<1.0ppm)
Extractable Cadmium expressed as	Cd 1mg/kg	(1.0ppm)
Extractable Chromium expressed as	Cr less than 3mg/kg	(<3.0ppm)

If the adhesive is used in the scope of the regulation EU No 10/2011 the compliance with the migration limits should be assessed by the manufacturer of the final food contact material or article in accordance with the intended conditions of use (time, temperature, food simulants etc.). Tests should be carried out following the rules laid down in regulation EU No 10/2011. The downstream user also needs to evaluate the possible influence on the organoleptic properties of the food.

On behalf of Pafra Adhesives Limited



Andy Steward  
Technical Director

26/01/16



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**Disclaimer:**

Please note that these details are based on the information given to us by our own suppliers at the date of this document and assessed with the best of our knowledge. It applies only the recommended conditions of use and does not represent a warranty.



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