



Food Contact Statement

Avery Dennison Label and Graphic Materials Europe
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June 21, 2019

Product Code: FCS AW147

Product Description: PP20 MATT CLEAR S692N-BG40WH FSC

Adhesive:

Categories of Food Evaluated and for which Lawfulness Has Been Confirmed:

- The adhesive is approved for dry, moist and fatty foodstuffs. *

* Such kind of fatty foodstuffs to which a reduction factor of at least 3 can be applied according to Regulation (EU) No 10/2011.

Compliance with following Regulations:

- EU Framework Regulation – (EC) No 1935/2004
- EU GMP Regulation – (EC) No 2023/2006
- EU Plastics Regulation – (EU) No 10/2011

Face Material:

- The face material is approved for all kinds of foodstuffs

Compliance with following Regulations:

- EU Framework Regulation – (EC) No 1935/2004
- EU GMP Regulation – (EC) No 2023/2006

Conditions of use for the face material:

The use of the face material can be regarded as safe (provided that the conditions listed below are met):

the film is approved for any long term storage at room temperature or below, including heating up to 70 °C for up to 2 hours, or heating up to 100 °C for up to 15 minutes

Determination of the Overall Migration for the Adhesive:

The determination was carried out according to the methods for the “Examination of customer goods” corresponding to the directives B 80.30, 1 to 3 (EG) of the Official Collection of Analytical Methods according to § 64 LFGB and according to the rules of the series of standards EN 1186, EN 13130 and CENT/TS 14234 “Materials and articles in contact with foodstuffs – Plastics”.

Test Simulant	Test Conditions	Testing Procedure	Overall Migration
10% ethanol	24h at 40°C	one-sided contact	< 10 mg/dm ²
Olive Oil	24h at 40°C	Total immersion	< 10 mg/dm ²
Tenax	10d at 40°C	Adhesive was adhered to cigarette paper. Other side of cigarette paper was in direct contact with Tenax®	< 10 mg/dm ²

Determination of the Overall Migration for the Face Material:

Test Simulant	Test Conditions	Testing Procedure	Overall Migration
10% ethanol	10d at 40°C	one-sided contact	< 10 mg/dm ²
3% acetic acid	10d at 40°C	one-sided contact	< 10 mg/dm ²
Olive Oil	10d at 40°C	Total immersion	< 10 mg/dm ²
Tenax	2d at 20°C	Total Immersion	< 10 mg/dm ²

Specific Migration Testing for adhesive:

Test conditions used to confirm specific migration according to 10/2011/EU for the Adhesive.

Test Simulant	Test Conditions	Testing Procedure	Overall Migration
95% ethanol	24h at 40°C	Total immersion	< 10 mg/dm ²
Tenax	2d at 20°C	Total Immersion	< 10 mg/dm ²
Tenax	10d at 40°C	Adhesive was adhered to cigarette paper.	< 10

		Other side of cigarette paper was in direct contact with Tenax®	mg/dm ²
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Specific Migration Testing for the face material:

Test conditions used to confirm specific migration according to 10/2011/EU for the face material:

Test Simulant	Test Conditions	Testing Procedure	Overall Migration
10% ethanol	10d at 40°C	one-sided contact	< 10 mg/dm ²
3% acetic acid	10d at 40°C	one-sided contact	< 10 mg/dm ²
Olive Oil	10d at 40°C	Total immersion	< 10 mg/dm ²



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Specific Migration Limits (SML):

The following authorized substances subject to specific migration limits listed in table 1 of EU Regulation 10/2011 are used and not exceeded based on analysis results:

CAS number	FCM No	Substance Name	SML (mg/kg)
--	19	N,N-bis(2-hydroxyethyl)alkyl (C8-C18)amine	SML (T) = 1.2 (Group Restriction 7)
0000057-11-4	106	Stearic acid	60
0000079-10-7	147	acrylic acid	SML (T) = 6 (Group Restriction 22)
0000080-62-6	156	methacrylic acid, methyl ester	SML (T) = 6 (Group Restriction 23)
0000096-33-3	176	acrylic acid, methyl ester	SML (T) = 6 (Group Restriction 22)
0000097-90-5	185	methacrylic acid, diester with ethyleneglycol	0.05
0000103-11-7	206	acrylic acid, 2-ethylhexyl ester	0.05
0000128-37-0	315	2,6-di-tert-butyl-p-cresol	3
0000592-41-6	356	1-hexene	3
0002082-79-3	433	octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	6
0002682-20-4	451	2-methyl-4-isothiazolin-3-one	0.5
0026741-53-7	652	bis(2,4-di-tert-butylphenyl) pentaerythritol diphosphite	0.6
0027676-62-6	661	1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	5
0038613-77-3	688	tetrakis(2,4-di-tert-butyl-phenyl)-4,4'-biphenylene diphosphonite	18
0154862-43-8	773	bis(2,4-dicumylphenyl)pentaerythritol-diphosphite	5
—	813	sulphosuccinic acid alkyl (C4-C20) or cyclohexyl diesters, salts	5

the film is formulated that the specific migration limits cannot be exceeded under the normal recommended conditions of use even if all of the substances migrate into the food. (also present 292)

Dual-Use Additives:

E-number	Additive Name
E 170	Calcium carbonate, Chalk
E 330	Citric acid
E 470a	Sodium, potassium and calcium salts of fatty acids (emulsifier)
E 551	Silicon dioxide (Silica)
E 900	Dimethyl polysiloxane (anti-foaming agent)

General:

Please note that the adhesive and face material have been assessed individually. The user is responsible for the examination of the suitability of the packaging both for the planned filling good/foodstuff and kind of application.

Sincerely,

Product Regulatory Compliance & Sustainability Team
Avery Dennison Materials Group Europe

Avery Dennison Label and Graphic Materials Europe