

Haldur: Keskkonna- ja kvaliteedijuht

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TOODE: KP300966 Bagelrasia ikkunalla,130x60x130mm

1) Articles and identification:

Carton box with PET window and dispersion barrier coating inside:

Article number (*Item* nr)/ *Batch* Client reference Dimensions [mm] 300966 / 504207 130x60x130

2) Conformity:

Product conforms to the following legislation:

- REGULATION (EC) 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.
- COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.



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3) Used materials:

Products mentioned in point 1 have been produced using following original materials:

Product:	Producer:	Address:	Composition (CAS/EC):
CKB Nude AquaTM	Stora Enso Oyj	Stora Enso Skoghall Mill Box 501 Bruksgatan SKOGHALL, VÄRMLAND SE-66329 Sweden	Mixture*
5934-3000 and/or 401-1000-B	GLUDAN GmbH	Am Hesterkamp 2 21514 Buechen, Germany	Vinyl acetate/ethylene-copolymer aqueous solution (/)*
Hubergroup NewV pack MGA Premium & XE MGA CRS inks*	hubergroup Polska Spółka z o.o.	hubergroup Polska Spółka z o.o. Nowa Wieś Wrocławska ul.Nowa 27 55-080 Kąty Wrocławskie Poland	Mixture*
ACTEGA TERRAWET Gloss Coating G 9/378 FoodSafe-040	ACTEGA Terra GmbH	ACTEGA Terra GmbH Industriestraße 12 31275 Lehrte Germany	Mixture*
optimont® AF	Bleher Folientechnik GmbH	Max-Planck-Straße 6 71254 Ditzingen-Heimerdinge n	Mixture*

All used printing inks and varnishes have been produced according to EuPIA "Good Manufacturing Practices" (GMP) Printing inks for food contact materials (GMP, Regulation (EC) No 2023/2006)."

^{*} Exact composition of materials can be trade secret. Statement of Composition (SoC) is issued after signing non-disclosure agreement (NDA).



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4) Intended use:

When the barrier is on food contact side, this product is intended for packaging dry, aqueous, alcoholic and fatty foodstuffs.

This product is intended for use under the following conditions of temperature and time for food types above.

- Frozen/fridge
- Room temperature (up to 40°C for more than 24 hrs)
- Hot-fill*

This product is not intended for use under the following conditions:

- Frozen/fridge for acidic foodstuffs
- · Room temperature for acidic foodstuffs
- Hot-fill* for acidic foodstuffs
- · Microwave oven for all foodstuffs
- · Conventional oven for all foodstuffs
- * It is the responsibility of the packer of the finished articles to ensure that the article is safe to use in the intended conditions. "Hot-fill" means the filling of any article with a food with a temperature not exceeding 100 °C at the moment of filling, after which the food cools down to 50 °C or below within 60 minutes, or to



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5) Overall migration and specific migration tests:

NOTE: According to Article 14 of the Commission Regulation (EU) 10/2011: In a multi-material multi-layer material or article, the composition of each plastic layer shall comply with this Regulation. Overall migration limits and specific migration limits of this Regulation do not apply to plastic layers in multi-material multi-layer materials and articles. In a multi-material multi-layer material or article, specific and overall migration limits for plastic layers and for the final material or article may be established by national law.

The overall migration tests have been performed on representative samples of the food contact side of the product according to EN 1186 in modified conditions with the following results. The overall migration limit 10 mg/dm2 stipulated in the Commission Regulation (EU) 10/2011* is not exceeded.

Simulant	Test number	Contact time [h]	Temperature [°C]	SVR [dm2/ml]	Result [mg/dm2]
МРРО	ОМЗ	2	70	-	Conforms to 10/2011
50 % ethanol	ОМЗ	2	70	-	Conforms to 10/2011
Isooctane	ОМЗ	0,5	40	-	Conforms to 10/2011
95 % ethanol	OM3	2	60	-	Conforms to 10/2011

^{*}Based on our current understanding, (EU) Food Contact Plastics Regulation No 10/2011 is not applicable for dispersion products. To ensure the safety of the dispersion products we do perform overall migration testing, but with modified conditions. The temperature and food simulants are chosen according to the standard, but the time might be modified as applicable.

Supplier of material "optimont® AF" has tested overall migration accordingly:

Simulant	Test number	Contact time [h]	Temperature [°C]	SVR [dm2/ml]	Result [mg/dm2]
A: 10 % ethanol	OM6	4	100	-	Conforms to 10/2011
B: 3 % acetic acid	OM6	4	100	-	Conforms to 10/2011
D2: Veg. oil	OM7	2	175	-	Conforms to 10/2011

Test OM 6 covers also food contact conditions described for OM1, OM2, OM3, OM4 and OM5. It represents worst case conditions for food simulants A, B and C in contact with non-polyolefins.

Test OM 7 covers also food contact conditions described for OM1, OM2, OM3, OM4, OM5. It represents the worst case conditions for fatty food simulants in contact with non-polyolefins.

Supplier of material "optimont® AF" has tested specific migration accordingly:

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A: 10 % ethanol	OM6	4	100	-	Conforms to 10/2011
B: 3 % acetic acid	OM6	4	100	-	Conforms to 10/2011
D2: Veg. oil	OM7	2	175	-	Conforms to 10/2011

Simulant	Test number	Contact time [h]	Temperature [°C]	SVR [dm2/ml]	Result [mg/dm2]
A: 10 % ethanol	-	10	60	-	Conforms to 10/2011
B: 3 % acetic acid	-	10	60	-	Conforms to 10/2011
D2: Veg. oil	-	10	60	-	Conforms to 10/2011



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6) List of substances contained with restrictions and/or specifications according Regulation (EC) no 10/2011:

Based on declarations provided by producer of material: " ACTEGA TERRAWET Gloss Coating G 9/378 FoodSafe-040", the following substances which have restrictions according to Annex I and Annex II of Regulation (EC) no 10/2011 can be present in used varnishes:

Substance name	CAS number	Limit	Dimension	Result [mg/dm2]
Acrylic acid, 2-ethylhexyl ester	103-11-7	0,05	[mg/kg] (SML)	Conforms to 10/2011
2-Ethyl-1-hexanol	104-76-7	30	[mg/kg] (SML)	Conforms to 10/2011
2-Methyl-4-isothiazol-3-one	2682-20-4	0,5	[mg/kg] (SML)	Conforms to 10/2011
Sulfosuccinic acid Alkyl(C4-C20)- Cyclohexyldiester, Natriumsalt	577-11-7	5	[mg/kg] (SML)	Conforms to 10/2011
Polyethyleneglycol (EO=1-50) ethers of primary linear and branched C8-C22	-	1,8	[mg/kg] (SML)	Conforms to 10/2011
Polyethylene, oxidised	68441-17-8	60	[mg/kg] (SML)	Conforms to 10/2011
Sodium sulphite	7757-83-7	10	[mg/kg] (SML(T))	Conforms to 10/2011
alpha-Methylstyrene	98-83-9	0,05	[mg/kg] (SML)	Conforms to 10/2011

Based on declarations provided by producer of material: "5934-3000 and 401-1000-B", the following substances which have restrictions according to Annex I and Annex II of Regulation (EC) no 10/2011 can be present in used adhesives:

Substance name	CAS number	Limit	Dimension	Result [mg/dm2]
Acetaldehyde (NIAS)	0000075-07-0	6	[mg/kg] (SML(T))	Conforms to 10/2011
Formaldehyde (NIAS)	0000050-00-0	15	[mg/kg] (SML(T))	Conforms to 10/2011
Vinyl acetate	0000108-05-4	12	[mg/kg] (SML)	Conforms to 10/2011

Based on declarations provided by producer of material: "optimont® AF", the following substances which have restrictions according to Annex I and Annex II of Regulation (EC) no 10/2011 can be present in used window-film:

Substance name	CAS number	Limit	Dimension	Result [mg/dm2]
Terephthalic acid	0000100-21-0	7,5	[mg/kg] (SML(T))	Conforms to 10/2011
Isophthalic acid	0000121-91-5	5	[mg/kg] (SML(T))	Conforms to 10/2011



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Ethyleneglycole	0000107-21-1	30	[mg/kg] (SML(T))	Conforms to 10/2011
Diethyleneglycole	0000111-46-6	30	[mg/kg] (SML(T))	Conforms to 10/2011
Sb2O3	0007440-36-0	0,04	[mg/kg] (SML(T))	Conforms to 10/2011
Alumiinium (Al)	0007429-90-5	1	[mg/kg] (SML(T))	Conforms to 10/2011

If substances are intentionally used which are listed in Annex II paragraph 1 of the Plastics Regulation or which could release primary aromatic amines (paA) listed in Annex II, these are also listed in particular section 6 and, if applicable, marked with "Conforms to 10/2011" if compliance with the limit values for the use of the material or article specified in section 4 is ensured. Elements, migration in simulant B (worst-case):

Substance name	CAS number	Limit	Dimension	Result [mg/dm2]
Aluminium (Al)	0007429-90-5	1	[mg/kg] (SML)	Conforms to 10/2011
Antimony (Sb)	0007440-36-0	0,04	[mg/kg] (SML)	Conforms to 10/2011
Arsenic (As)	0007440-38-2	0,01 (ND)	[mg/kg] (SML)	Conforms to 10/2011
Barium (Ba)	0007440-39-3	1	[mg/kg] (SML)	Conforms to 10/2011
Lead (Pb)	0007439-92-1	0,01 (ND)	[mg/kg] (SML)	Conforms to 10/2011
Cadmium (Cd)	0007440-43-9	0,002 (ND)	[mg/kg] (SML)	Conforms to 10/2011
Chromium (Cr)	0007440-47-3	0,01 (ND)	[mg/kg] (SML)	Conforms to 10/2011
Iron (Fe)	0007439-89-6	48	[mg/kg] (SML)	Conforms to 10/2011
Europium (Eu)	0007440-53-1	0,05	[mg/kg] (SML(T))	Conforms to 10/2011
Gadolinium (Gd)	0007440-54-2	0,05	[mg/kg] (SML(T))	Conforms to 10/2011
Cobalt (Co)	0007440-48-4	0,05	[mg/kg] (SML)	Conforms to 10/2011
Copper (Cu)	0007440-50-8	5	[mg/kg] (SML)	Conforms to 10/2011
Lanthanum (La)	0007439-91-0	0,05	[mg/kg] (SML(T))	Conforms to 10/2011
Lithium (Li)	0007439-93-2	0,6	[mg/kg] (SML)	Conforms to 10/2011
Manganese (Mn)	0007439-96-5	0,6	[mg/kg] (SML)	Conforms to 10/2011
Nickel (Ni)	0007440-02-0	0,02	[mg/kg] (SML)	Conforms to 10/2011
Mercury (Hg)	0007439-97-6	0,01 (ND)	[mg/kg] (SML)	Conforms to 10/2011



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Terbium (Tb)	0007440-27-9	0,05	[mg/kg] (SML(T))	Conforms to 10/2011
Zinc (Zn)	0007440-66-6	5	[mg/kg] (SML)	Conforms to 10/2011

Based on declarations provided by producer of material: "optimont® AF", it can be assumed that no primary aromatic amines listed in Table 1 of Annex I to Regulation (EU) No 10/2011 are released to food or food simulants above the limit values.

Furthermore, it can be assumed that none of the following primary aromatic amines are released in a detectable quantity into food or food simulant:

- Substances listed in entry 43 to Appendix 8 of Annex XVII of Regulation (EC) No 1907/2006: detection limit 0.002 mg/kg food or food simulant.
- Sum of primary aromatic amines: detection limit 0.01 mg/kg food or food simulant

Based on declarations provided by producer of material: "optimont® AF", a risk assessment has been carried out on NIAS compounds in accordance with Article 19 of Regulation (EU) No 10/2011. Migration of NIAS compounds was semi quantitatively estimated and found to be either below 10ppb in the food or at concentrations above 10ppb but below a level of concern assessed by either comparison against published toxicological data or by applying the Threshold of Toxico logical Concern (TTC) approach.



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7) Dual Use Additives:

Based on declarations provided by producer of material: "CKB Nude Aqua", the following dual use additives can be present in carton board:

Substance	CAS number	EC number	E number	ADI [mg/kg]
calcium carbonate	471-34-1	207-439-9	E170	-
sodium sulfite	7757-83-7	231-821-4	E221	-
sodium bisulfite	7631-90-5	231-548-0	E222	-
sodium metabisulphite	7681-57-4	231-673-0	E223	-
sodium nitrate	7631-99-4	231-554-3	E251	-
acetic acid	64-19-7	200-580-7	E260	-
potassium acetate	127-08-2	204-822-2	E261	-
citric acid	77-92-9	201-069-1	E330	-
disodium phosphate	7558-79-4	231-448-7	E339	-
adipic acid	124-04-9	204-673-3	E355	-
xanthan gum	11138-66-2	234-394-2	E415	-
glycerol	56-81-5	200-289-5	E422	-
sodium carboxymethylcellulose	9004-32-4	618-378-6	E466	-
sorbitan monostearate	1338-41-6	215-663-3	E491	-
sorbitan monolaurate	1338-39-2	215-664-9	E493	-
sodium carbonate	497-19-8	207-838-8	E500	-
magnesium carbonate	208-915-9	208-915-9	E504	-
magnesium chloride	7786-30-3	232-094-6	E511	-
sulfuric acid	7664-93-9	231-639-5	E513	-
sodium sulphate	7757-82-6	231-820-9	E514	-
aluminium sulphate	10043-01-3	233-135-0	E520	-
sodium hydroxide	1310-73-2	215-185-5	E524	-



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silicon dioxide	7631-86-9 /112926-0	231-545-4	E551	-
stearic acid	57-11-4	200-313-4	E570	-
starch sodium octenyl succinate	52906-93-1	610-914-7	E1450	-
propane-1,2-diol	57-55-6	200-338-0	E1520	-
polyethylene glycol	25322-68-3	500-038-2	E1521	-
glutaraldehyde	111-30-8	203-856-5	FL No 05.149	-
ethyl acrylate	140-88-5	205-438-8	FL 09.037	-

Based on declarations provided by producer of material: "ACTEGA TERRAWET Gloss Coating G 9/378 FoodSafe-040", the following dual use additives can be present in used varnishes:

Substance	CAS number	EC number	E number	ADI [mg/kg]
Sodium sulphite	7757-83-7	231-821-4	E 221	-
Ammonia	7664-41-7	215-647-6	E 527	-
Propylene glycol	57-55-6	200-338-0	E 1520	-
Glycerol	56-81-5	200-289-5	E 422	-
Dimethylpolysiloxane	70131-67-8	613-154-4	E 900	-
Polyethylene waxes, oxidized	68441-17-8	614-498-8	E 914	-
Acetic acid	64-19-7	200-580-7	E 260	-

Based on declarations provided by producer of material: "5934-3000 and 401-1000-B ", the following dual use additives can be present in used adhesives:

Substance	CAS number	EC number	E number	ADI [mg/kg]
Triacetin	102-76-1	203-051-9	E 1518	-

Based on declarations provided by producer of material: "optimont® AF", the following dual use additives can be present in window-film:

Substance	CAS number	EC number	E number	ADI [mg/kg]
Silicon dioxide	7631-86-9	231-545-4	E 551	-
Aluminium	7429-90-5	231-072-3	E 173	-



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Note: the listed Dual Use Additives (DUA) are present in the raw materials as impurities and have no technological properties in the final product.

8) Printing inks:

Printing inks mentioned in point 3 must not be in direct contact with food.

9) Absolute barrier:

Absolute barrier is not present.

10) Validity of declaration:

This declaration is valid from the date written below and it shall be replaced when changes have been introduced in the production of material (such as, by way of example, changes in process, raw materials, additives used in manufacturing) that can change some essential requirements in terms of conformity or when the legislative references under point 2) are modified and updated to such an extent as to require a new inspection.

Date: 11/04/2025

Q&E Manager Mikk Kull AS Kroonpress 133 Tähe, 50107, Tartu, Estonia



Vaatimuksenmukaisuustodistus koskee seuraavia Ki-Sal Oy:n maahantuomia ja myymiä tuotteita:

Ki-Sal tuotekoodi Tuotekuvaus ja toimittajan tuotenumero

KP300966 Bagelrasia ikkunalla ruskea 240kpl/ltk