



**VPK Packaging NV**  
Kareelstraat 108 9300 Aalst



## DECLARATION OF CONFORMITY

This declaration is valid for all corrugated board and solid board packaging, in special cases with an extra PE-layer, intended for the packaging of foodstuff, produced at the VPK Packaging NV sites listed below (further defined as “Packaging”). Solid board products are marketed under the brand name “Smart Packaging Solutions” (SPS).

### Production sites:

#### **Corrugated board**

VPK Packaging Dendermonde  
Oude Baan 120 9200 Dendermonde

VPK Packaging Erembodegem  
Zuid 3 Industrielaan 13 9320 Erembodegem (Aalst)

#### **Solid board**

Smart Packaging Solutions Dendermonde  
Oude Baan 120 9200 Dendermonde

Smart Packaging Solutions Meer  
Europastraat 28 2321 Meer

### Section I: Declaration

VPK Packaging NV declares that all Packaging conforms to the regulations and recommendations in force, as listed in Section II of this Declaration of Conformity.

The Packaging may come into direct contact with dry, non-fatty or permanently deep-frozen food and foodstuffs that must be shelled, peeled or washed before consumption. All foodstuffs may be packed indirectly in all of the Packaging, provided that a suitable primary packaging is used as a buffer. Direct contact with fatty foods is possible if an appropriate liner is used as an inner liner or a suitable coating is applied to the inner liner. For example, in specifically chosen liners, the PE layer is suitable for direct contact with dry, moist, acidic, deep-frozen and fatty foods.

This declaration is only valid insofar as the Packaging is correctly used, which implies the following:

- during storage before use, protect against moisture and extreme temperatures (recommendation: between 30% and 70% RH and +5 to +25°C) and use as packaging within six months after the production date where possible; and only use for intended use and subject to compliance with the following restrictions:
  - flash freezing possible up to - 45°C;
  - cold storage possible up to -25°C;
  - never thaw items in the boxes;
  - never use for hot dishes.

### Section II: Argumentation and Documentation

II. A. All liners conform to the requirements and recommendations regarding purity, migration and organoleptic integrity as laid down in:

- Regulation (EU) 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, consolidated version dated 27/03/2021;
- Belgian Royal Decree of 11 May 1992 on materials and articles intended to come into contact with foodstuffs (the total migration in all paper types is < 60 mg per 6 dm<sup>2</sup>/kg of food);
- German BfR (Bundesinstitut für Risikobewertung) recommendation XXXVI. “Paper and board for food contact”, version dated 01/02/2023;
- Italian Ministerial Decree of 21/03/1973 – “Disciplina igienica degli imballaggi, recipienti, utensili, destinati a venire in contatto con le sostanze alimentari o con sostanze d’uso personale”, update ID 2872 from 11/08/2023;

- Industry guidelines: "Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles" version dated March 2019 (ACE, CCB, CITPA, ETS, ECMA, FEFCO).
- For board grades with PE-layer (Low-density polyethylene LDPE): Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food, current consolidated version: 31/08/2023 and Article 3, 11(5), 15 and 17 of Regulation (EC) No 1935/2004.

II. B. The composition of the recycled paper materials conforms to, and has been communicated in accordance with, standard NBN EN 643 (2014). The proportions of pre industrial and postconsumer sources are known.

### Section III: Analyses

The following specific analyses are performed every two years in external, ISO 17025 accredited laboratories:

- specific migration tests on all paper types with additional attention to current points of concern;
- migration tests linked to printing on representative 100% flexo printed boxes in corrugated board and solid board and offset for solid board;
- biocide residue analysis on corrugated board samples with the highest relative glue content;
- total migration on a representative finished product;
- LDPE is tested by the suppliers according to the rules of the series of standards EN 1186, EN 13130 and CEN/TS 14234 and 14235. The choice of test stimulants as well as contact conditions was performed according to requirements of Annex III and V of Commission Regulation (EU) No 10/2011.

All results confirm that there are no objections to employing these materials as described in Section I of this Declaration of Conformity.

Suppliers of raw materials, and suppliers of relevant auxiliary agents, are systematically requested to provide all available documents regarding their position on food safety and their traceability. All reports and documents will be provided on request.

### Section IV: Additives

VPK Packaging NV does not use bisphenol A in the production of Packaging and complies with the French "Loi n° 2010-729 du 30 juin 2010 modifiée par la loi n°2012-1442 du 24 décembre 2012" et "La décision QPC n°2015-480 du Conseil Constitutionnel du 17 septembre 2015".

In the processes, VPK Packaging NV also does not use or add:

- anthraquinone, phthalates, TOF; PFAS, PFOA, PFOS, PFNA, PFHxS, LC-PFCAs, mineral oils;
- active and/or intelligent materials;
- substances that are only permitted in paper and cardboard behind a functional barrier;

The LDPE does not contain any direct food additives.

The inks meet the requirements, as laid down in the French AGECE Act on April 13, 2022.

### Section V: Certification

The four VPK Packaging NV production sites listed above have been BRC/IOP certified since 2005 and BRC Global Standard Packaging Materials certified since April and May 2016 (currently version VI) and thus comply with the management requirements as laid down in Regulation (EU) 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, consolidated version dated 17/04/2008.

This declaration is valid till 31 January 2026, unless changes occur earlier.

Aalst, 1 August 2024.

Jan Willaert  
Business Unit Manager Corrugated Board Belgium

Johan De Neef  
Business Unit Manager Smart Packaging Solutions