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Fora Grafica S.r.l.
Ms. Simona Zardi
Via A.B. Nobel 11/A
43122 Parma (PR) Italy

Neusäß, 09.09.2019

Declaration of no objection

Dear Ms. Zardi,

We confirm that toxic heavy metals or compounds thereof are not used as constitutional components in our SensoPack GAMA printing ink systems.

Since in general pigments are considered to be the main source for heavy metal entry in printing inks, we can refer to the statements of our pigment suppliers with regard to the trace contents of the heavy metals lead, cadmium, mercury and chromium (VI). According to random sample tests, the sum value for the total content of the heavy metals mentioned before not only complies with, but also falls below the lowest CONEG limit of 100 ppm. This threshold was also embodied in article 11 of the European packing guidelines 94/62/EG from December 20th, 1994. Varnishes, in general, as unpigmented or in particular cases slightly pigmented products show even lower heavy metal contents.

Our printing inks and varnishes meet the conditions of the European standard EN 71/3 for toys (except Pantone® Warm Red).

In addition, we declare that our products are manufactured in accordance with EuPIA (=European Printing Ink Association) guidelines and the „Exclusion Policy for Printing Inks and Related Products“ (for details visit www.eupia.org), which excludes the use of toxic raw materials.

Our SensoPack GAMA Ink System enables the final print product to comply with the German comestibles and animal food law book LFGB (until 07.09.2005: Food and consumer article law) and Regulation (EC) No. 1935/2004 as follows:

1. §30: No endangerment of the human health

During the formulation and manufacture of our products, we strictly follow the EuPIA (European Printing Ink Association) raw material exclusion policy for printing inks and associated products (www.eupia.org). This policy excludes the use of toxic raw materials.

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2. §31: No inadmissible change in the composition of the filling material

Via careful formulation, our food packaging inks and varnishes ensure that a potential migration of ingredients into food through the packaging material or by set off (= migration from the ink layer to the non-printed food contact side of the printing substrate within the stack or reel, dependent on the processing conditions) is as small as possible. Nevertheless, it has to be guaranteed that the overall migration resulting from each individual packaging layer is reduced to a toxicological and organoleptic insignificant yet technologically unavoidable amount.

3. Good Manufacturing Practice for the production of packing printing inks

Our printing inks and varnishes for food contact materials are manufactured according to the strict principles defined by EuPIA's Good Manufacturing Practice (GMP) for Printing Inks for Food Contact materials (based on Regulation (EC) No. 2023/2006). This document describes the necessary co-operation between printing ink manufacturers and all users down the supply chain to offer our customers optimal tailor-made products for the respective printing project.

The content of §§ 30 and 31 is identical to the requirements set out in article 3 of the Regulation (EC) No. 1935/2004 about "materials and articles which are intended to come into contact with food", which was implemented in all European Union member states.

It has to be noted that the food regulation requirements mentioned above apply to the final product "packing" only, and not to its individual components, e.g. printing inks or varnish coating. For this reason, the manufacturer and distributor of consumer articles (not the raw material supplier), ultimately carries full responsibility that his products meet the legal requirements.

Legal conformity also involves careful selection of the printing inks regarding fastness and resistance properties by means of our labels and technical data sheets to avoid bleeding or impairment of the ink layer in case of a coincidental, but foreseeable, contact with the packaged food.

In addition we attach the instruction leaflet "Printing inks for food packing" with this declaration. General information regarding the use of offset printing inks for food packaging you will find in the enclosed statement from EuPIA.

Best regards

Sicolor GmbH


Sebastian Zech

Product Safety