

Validity:
June 2024 – June 2025**1E-D2-1. DECLARATION OF CONFORMITY**

Version 8

Intended use and use restrictions

Our products are designed to label products and packaging for indirect food contact. The inks, laminating adhesive and lacquers are designed for use on the packaging outside (Non-DFC). A direct contact of the filling with the printed image has to be avoided.

We hereby confirm that the above product conforms to the following standard, laws and regulations.

BRC Global Standards for Packaging and Packaging Materials

The sites within Optimum Group Netherlands are certified, according to the BRC Global Standard for Packaging Materials, Issue 6, August 2019. This includes; Etiket Nederland, Max. Aarts, W&R Etiketten, Vila Etiketten, Belona, Megaflex, Opti-Label and Optimum Group Wellen.

Food safety - EC 1935/2004

Regulation (EC) No 1935/2004 requires that materials and articles which, in their finished state, are intended to come into contact with food shall not transfer components to the packaged product in quantities that could endanger human health.

This means that the manufacturer of the finished product and filler has the legal responsibility to ensure that the food packaging is fit for its intended purpose. Provided that our supplied products are processed correctly and provided that the food packaging is designed in such a way that there is no intended direct food contact with the print, we hereby confirm that our products in principle do this and will allow compliance of the final product with Regulation 1935/2004. For more detailed information, we can supply you with the technical datasheets and food compliance statements for the specific products we supply to you.

Plastic materials and food safety - EC 10/2011

This regulation is a special measure supplementing Article 5 of Regulation (EC) No. 1935/2004 and concerns plastic materials and articles intended to come into contact with food. The supplied products, in which raw materials of plastic materials are used, comply with Directive EC 10/2011.

Good Manufacturing Practice (GMP) - EC 2023/2006

Regulation (EC) No. 2023/2006 concerns legislation around good manufacturing practice for materials and articles intended to come into contact with food. A quality assurance and quality control system is in place, built into the quality management system. This describes the manufacturing process and methods and sets out control points.

Chemical substances - EC 1907/2006

Our company uses chemical substances such as inks and varnishes, chemicals used in substrates and adhesives for the production of labels, which are covered by legislation EC/1907/2006. We are a downstream user and do not have to pre-register.

Our suppliers continuously monitor the development of the candidate list of substances of very high concern (SVHC). For more details, please ask for our REACH declaration.

Packaging and Consumer Products (RVG) Commodities Act Decree – EG 1935/2004

This decree is derived from the Regulation (EC) 1935/2004. This regulation is part of the Commodities Act and implements the Packaging and Consumer Articles Decree (VGB). The products are supplied in accordance with this legislation.

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Country of origin – EG 2913/92

According to Regulation (EEC) 2913/92, Optimum Group B.V. falls under the non-preferential rules of origin (articles 22 to 26). The products are manufactured entirely in the Netherlands and the raw materials are supplied by suppliers from the European Community (art. 3).

Packaging Waste – Directive 94/62/EC

The Optimum Group is aware of the waste streams it puts on the market and makes every effort to reduce them. Within the production process, waste is separated and properly stored and disposed of. In order to further reduce waste streams, the Optimum Group works extensively with paper suppliers, among others. Together we look for innovative solutions, such as using FSC material and reducing the thickness of materials wherever possible. The backing material of the labels can be returned free of charge for a special recycling program. For more information contact our sales department.

PFAS

Perfluoroalkyl compounds, including perfluoroalkyl sulfonates such as perfluorooctane sulfonate (PFOS), fluorotelomers, telomer-based polymer materials and perfluorooctanoic acid (PFOA) are not used or added by Optimum Group's raw material suppliers in the manufacture of self-adhesive laminates and related products.

We cannot guarantee zero percentages for the substances, due to the fact that many substances are present in nature and many substances can become part of materials, products and articles due to many different causes/ways beyond our control. Furthermore, with the ongoing development of analytical tools and protocols, it is possible that substances that cannot be detected today may be detected tomorrow.

Bisphenols

Bisphenols are not part of the composition of raw materials used in the manufacturing process. Our substrate suppliers do not use bisphenol A and bisphenol S in the manufacture of self-adhesive label-stock and related products as raw materials or additives. However, please note that some direct thermal surfaces and thermal plates may contain bisphenol S. Ink suppliers confirm that bisphenols are never intentionally added. Although its presence is unlikely, specific analysis of this substance is not part of the ink suppliers' standard quality control. The presence of traces of these substances in the lacquers and inks have been caused by raw material impurities, from the process or as accidental contamination and cannot be ruled out.

RoHS, Directive 2011/65/EC (including Delegated Directive (EU) 2015/863)

The Directive 2011/65/EU (known as RoHS2) of 8 June 2011 and Commission Delegated Directive (EU) 2015/863 (RoHS3) of 31 March 2015 amending Annex II to Directive 2011/65/EU established maximum concentration values for 10 restricted substances in electrical and electronic equipment (EEE) placed on the market in EU member states. RoHS restricted substances and their maximum allowable concentration values by weight in homogeneous materials include: Lead 0.1%, Mercury 0.1%, Cadmium 0.01%, Hexavalent chromium 0.1%, Polybrominated biphenyls (PBB) 0.1%, Polybrominated diphenyl ethers (PBDE) 0.1%, Bis(2-ethylhexyl) phthalate (DEHP) 0.1%, Benzylbutyl phthalate (BBP) 0.1%, Dibutyl phthalate (DBP) 0.1%, Diisobutyl phthalate (DIBP) 0.1%.

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The Optimum Group does not intentionally use the RoHS restricted substances and has no reason to suspect that these substances are present in our products at levels above the allowable concentrations. This statement is made based on information from our raw material suppliers. Please note we have not performed any laboratory analysis to confirm the absence or presence of any of the substances.

Persistent Organic Pollutants (POP) – EC 2019/1021

Regulation (EU) No 850/2004 as well as its recast Regulation (EU) No 2019/1021 were established by the European Union to restrict the use of persistent organic pollutants (POPs). It complies with the requirements of the Stockholm Convention.

Optimum Group does not intentionally add any of the substances in Part A of Annex I of Regulation (EU) 2019/1021 (including the amendment to Annex I in Delegated Regulation (EU) 2020/1204) and Regulation No. 850/2004 in the manufacturing processes of any of our factories. Should any of these substances exist as traces in our products or are generated during the printing process, their content is likely negligible.

It reflects the present state of our knowledge and experience. While their presence is unlikely, please note we have not performed any laboratory analysis to confirm the absence or presence of any of the POP substances.

Heavy metals and hazardous materials – EC 2002/95/EC

Heavy metals, as described in the CONEG regulation, and hazardous substances, as referred to in Directive 2002/95/EC, are not intentionally added in our production process.

Derivates from animals

Optimum Group does not use substrates or inks originated from animals in the printing process. However we do not have detailed information about all additives which are used further up the supply chain. Furthermore we do not use genetically modified organisms (GMO) or their derivatives in our production process. However, according to the generally accepted rules of technology, traces of contamination for which we are not responsible cannot be excluded.

Inks and toners

The ink, varnish and toner suppliers are active members of EuPIA and do not process the substances in the inks and follow the "Guideline on Printing inks applied to the non-food contact surface of food packaging materials and articles." CEPE is the European organization of manufacturers and importers of paints and printing inks, among others, with EuPIA representing CEPE's European Printing Inks Group. Years ago, the printing ink industry voluntarily established an exclusion list of specific CMR substances (e.g., carcinogens and T+ (very toxic)). The inks used are suitable for the non-contact side of food packaging. For the mineral oils statement (MOSH MOAH), upon request, we can send you a separate statement.

Outsourcing

The production of our products can be outsourced to a company that is GFSI certified or otherwise approved according to the BRC-Packaging standard.

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Datasheets and Food Conformity statements

On the datasheets and DOC statements of the raw materials, adhesives, packaging materials, inks and lacquers used can be found for which food contact these materials are suitable. Specific shelf life of the different materials is mentioned on the datasheet. These datasheets and statements are available on request to our customers.

Recycled materials

The recycled material used in standard delivered products is 0%. If the material does contain recycled content it is clearly indicated on the technical data sheet.

Migration tests

By default, the Optimum Group B.V. does not perform migration tests itself. However, migration tests of raw materials supplied by suppliers are available. Upon special request, migration tests can be performed on specific products. For more information and costs, please contact our sales department.

Storage and shelf life materials

Materials should be stored dry between 18 and 25 degrees Celsius with a humidity of approximately 60%. Prolonged storage outside these conditions may shorten the shelf life. After transportation, acclimate first for 24-48 hours for optimum product.



Annelies Börgeling
QHSE Manager
June 2024

This document replaces all previously published versions.

Disclaimer

This statement is for guidance only and is subject to change by Optimum Group B.V. without notice. This statement has been prepared in good faith and is based on the most current knowledge and experience of Optimum Group B.V. as well as information obtained from suppliers. Although Optimum Group B.V. has exercised care in preparing this statement and has used sources that are considered reliable, Optimum Group B.V. cannot guarantee the accuracy, completeness and timeliness of this statement and the information it contains. Optimum Group B.V. therefore expressly disclaims any liability regarding the accuracy, completeness, timeliness of the information in this statement. This statement does not constitute any warranty, express or implied, and is intended solely for the customer of Optimum Group B.V. Third parties may not derive any rights from this statement and the information contained herein. Optimum Group B.V. is not liable for the use of its products in combination with other materials. In this regard, the customer should make its own qualification and suitability tests before using Optimum Group B.V. materials as part of its products. Optimum Group B.V.'s products are sold under the exclusive applicability of its general terms and conditions.