

To whom it may concern;

October 15th , 2019

General Declaration of Conformity

Herewith We, Chemiprint, declare that:

1. Chemiprint's Packaging inks, solvents, solvents mixtures and other coatings are formulated in accordance with the "EuPIA Exclusion List for Printing Inks and Related Products", available at <http://www.eupia.org>
2. Chemiprint's Packaging inks, solvents, solvents mixtures and other coatings are formulated in accordance with the "EuPIA Good Manufacturing Practices for the Production of Packaging Inks formulated for use on the non-food contact surfaces of food packaging and articles intended to come into contact with food" ("GMP"). (EC) No 1935/2004, and GMP Regulation (EC) No 2023/2006 included.
Available at <http://www.eupia.org>.
3. We certify that Chemiprint's Packaging inks, solvents, solvents mixtures and other coatings complies do not intentionally contain any toxic heavy metals based according to CONEG and EU Directive 94/62/EC Article 11.
4. Chemiprint's Packaging inks, solvents, solvents mixtures and other coatings do not intentionally contain any substances have been identified as **SVHC (Candidate List)** published by ECHA, updated 16-07-2019.
5. None of the products produced by Chemiprint contain Toluene.
6. The components in which are used in the production of Chemiprint's inks, solvents, solvents mixtures and other coatings can be found on the positive lists of monomers and additives regulated by EC Directive 10/2011 as well as last amendments:
 - a. (EU) No. 2016/1416
 - b. (EU) No. 2018/213
 - c. (EU) No. 2018/831
 - d. (EU) No. 2019/37
7. None of the products produced by Chemiprint contain MELAMINE

FDA

The United States Food and Drug Administration (FDA) do not regulate printing inks as a “direct” or “indirect” food additive under Title 21 Code of Federal Regulations (CFR) 170 to 199. However, the FDA provides a definition for “functional barrier”:

"FDA has defined a "functional barrier" as a resinous coating / protective film / transparent covering or the substrate separating the printed matter from the food. A "functional barrier" is a barrier that prevents any potential migration from the printing ink to the food under reasonable expectations."

In a letter from the FDA to NAPIM (National Association of Printing Ink Manufacturers) it says:

"It is our opinion that printing inks applied to the outside surface of food packaging materials are not food additives within the meaning of Section 201(s) of the Act, provided the packaging material serves as a functional barrier between the printing ink and the food."

Chemiprint's inks and varnishes are formulated, manufactured, packed, labeled and delivered for surface or lamination printing. These products are suitable for non-food contact applications only when applied according to the relevant Good Manufacturing Practice (GMP) and in compliance with the relevant regulations. The converter / printer / packer has the legal responsibility to ensure that the ink and/or varnishes do not migrate to the food in any level that exceed regulatory requirements.

Guy Milstein

Chemiprint