

To whom it may concern;

February 23rd, 2020

General Declaration of Conformity

Herewith We, Chemiprint, declare that:

1. Chemiprint's printing inks, solvents, solvents mixtures and all 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 printing inks, solvents, solvents mixtures and all 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 printing inks, solvents, solvents mixtures and all other coatings do not intentionally contain any toxic heavy metals based according to CONEG and EU Directive 94/62/EC Article 11.
4. None of the substances listed in Directive (EU) 2011/65, Annex II [amended by Directive (EU) 2015/863] (lead, mercury, cadmium, chromium (VI), PBD, PBDE, and the phthalates DEHP, BBP, DBP and DIBP) are used in the manufacture of Chemiprint's printing inks, solvents mixtures and all other coatings, either as raw materials or as additives.
5. Chemiprint's printing inks, solvents, solvents mixtures and all other coatings do not intentionally contain any substances have been identified as **SVHC (Candidate List)** published by ECHA, updated 16-01-2020.
6. None of the products produced by Chemiprint contain Toluene.
7. The components in which are used in the production of Chemiprint's printing inks, solvents, solvents mixtures and all 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
8. 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