

To whom it may concern

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**Declaration of Compliance for Food Contact**  
according to article 16 of Regulation (EC) No 1935/2004 for

**Multilayer plastic casings/Flexcell/**

Multilayer plastic casing Flexcell is manufactured by Excellpack Bulgaria Ltd  
Multilayer plastic casing Flexcell is a co-extruded plastic casing (five layers) with the composition:

LAYER	COMPONENT
Outer	Blend of Polyamide 6 and Polyamide 6.66 (100%)
Tie	Polyolefin Adhesive (100%)
Core	Blend of Low Density Polyethylene and Allowed color masterbatches (100%)
Tie	Polyolefin Adhesive (100%)
Inner	Blend of Polyamide 6 and other Co-polyamides (100%)

Multilayer plastic casing Flexcell is not intended for human consumption.

*1 Status EU*

Multilayer plastic casing Flexcell complies with the suitable requirements of Regulation 1935/2004/EC of 27 October 2004 on materials and articles intended to come into contact with food and Regulation 2023/2006/EC of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food. In addition Polyamide Excellpack complies with Regulation 10/2011/EU of 14 January 2011 on plastic materials and articles intended to come into contact with food, amended to EU 2020/1245 of 02.09.2020.

*2 Food Applications*

Multilayer plastic casing Flexcell is suitable for aqueous and fatty foods.

*3 Printing Inks*

Only printing inks are used in the manufacturing of printed Multilayer plastic casing Flexcell for which our suppliers confirm that the delivered printing inks comply with:

- Good Manufacturing Practice for the production of food packaging inks
- EuPIA Guideline on Printing Inks applied to non-food contact surface of food packaging materials and articles, November 2011 2011 (corr. July 2012)
- EuPIA Inventory List Comprising of packaging ink raw materials applied to the non food contact surface of food packaging, December 2013
- the Swiss Ordinance SR 817.023.21 on Materials and Articles in Contact with Food, Section 8b, Packaging Inks, Art. 26e-26i.

#### 4 Migration Testing

The suitability of the Multilayer plastic casing Flexcell for food contact is tested at accredited institutes.

##### 4.1 Overall Migration (OM)

The following conditions and substitutes were used to test the overall migration of casings:

- Food simulant A (ethanol 10%) - 6 h/ 100°C followed by 10 days at 20°C. Ratio of volume of food simulant : area = 50ml : 1 dm<sup>2</sup>
- Food simulant B (3% acetic acid) - 6h/100°C followed by 10 days at 20°C. Ratio of volume of food simulant : area = 50ml : 1 dm<sup>2</sup>
- Food simulant D2 (vegetable oil) - 4h/100°C followed by 10 days at 40°C. Ratio of volume of food simulant : area = 180 ml : 1 dm<sup>2</sup>

##### 4.2 Specific Migration Limits (SMLs)

As far as Regulation 10/2011/EU stipulates specific migration limits (SMLs) for monomers or additives they are also met under the above-mentioned conditions. The following substances subject to limitations may be present in the film:

Ref. No.	Component	CAS no.	Restriction
14200 & 41840	caprolactam	105-60-2	SML(T) = 15 mg/kg expressed as caprolactam
18460 & 15274	hexamethylenediamine	124-09-4	SML = 2.4 mg/kg
19960	maleic anhydride	108-31-6	SML(T)=30 mg/kg expressed as maleic acid
22660	1-octene	111-66-0	15 mg/kg
46640	2,6-di-tert-butyl-p-cresol (BHT)	128-37-0	SML = 3 mg/kg
59120	1,6-hexamethylene-bis(3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionamide)	23128-74-7	SML = 45 mg/kg
68320	octadecyl3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	2082-79-3	SML = 6 mg/kg
68860	n-octylphosphonic acid	4724-48-5	SML = 0,05 mg/kg
89040 & 24550	Zinc stearate	57-11-4	SML=25 mg/kg (expressed as zinc)

Those SML are regularly tested in an accredited laboratory.

##### 5 Additives Having Multiple Functions ("Dual Use Additives")

The following additives subject to a restriction in food may be present:

Ref. No.	Dual use additives	E number
93440	titanium dioxide	E171
46640	BHT (Butylated hydroxytoluene)	E321
56486	glycerol, esters with acids, aliphatic, saturated, linear, with an even number of carbon atoms (C14-C18) and with acids, aliphatic, unsaturated, linear, with an even number of carbon atoms (C16-C18)	E471
86240	silicon dioxide	E551
30610	calcium salt	E470a
23590&76960	polyethyleneglycol	E1521
14680&4416	citric acid	E330

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**General:**

Food-contact articles are subject to official inspection. By observing the above regulations, we have fulfilled our duty of care regarding the compliance of the products we supply, according to the legislation governing food-contact articles in the EU. There are no limitations to use our casings in accordance with our instructions. It is the responsibility of the user to test the suitability of the casings for the intended food application and to ascertain, that the described conditions of testing migration cover the intended application. We accept no liability for losses arising from improper use of our products.

This letter is intended for your company only and replaces previous declarations of compliance for EU member states. It is only valid with an authorized and handwritten signature. If you have not purchased the product in more than 12 months, this letter ceases to be valid.

**Excellpack Bulgaria Ltd.**

**Name: Ivan Nachev**

**Signature & stamp:**



**Date: 22.01.2025**