Version 19 / 02-03-2017

02 March 2017

General Statement of Compliance
for
Benzophenone free UV-curing Varnishes

Hi-Tech Coatings International (hereafter referred to as “Hi-Tech”) certifies that the UV-Curing varnishes they produce comply with the following regulations and industrial standards:

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1. The product is manufactured in compliance with general and detailed rules on good manufacturing practice as defined by European Printing Ink Association (EuPIA) resulting from the Commission Regulation (EC) No 2023/2006. Hi-Tech holds ISO 9001 and ISO 14001.

2. The product complies with the EuPIA exclusion list of commodities for print colors and related products as well as the following regulations:

3. The amount of lead, chromium, cadmium and mercury falls, according to the information we received from the raw material manufacturers, below the total maximum threshold of 100 ppm given by Directive 94/62/EC (packing and wastage). Hence a conformity relating to the requirements on toys by German Standards Institute (DIN) EN-71-3 and CONEG Model Toxics Legislation is given.

4. Restriction of Hazardous Substances Directive II (RoHS-II) Directive 2011/65/EU

5. Regulation (EC) No 1895/2005 concerning the restriction of use of certain epoxy derivatives.

6. Directive 78/142/EEC on restriction of vinyl chloride monomer

7. All raw materials we are using in our production are not derived from Jatropha Plant. It is therefore also not possible that there can be a contamination with products derived from Jatropha Plants.

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8. In addition, we are pleased to state that the products, as constitutional components in the formulation, do not contain any of the following:

    - Substances fulfilling one or more of the criteria defined in Article 57 of the EU REACH Regulation can be identified as "substances of very high concern" (SVHC) and put on the "candidate List for authorization" which is also called "REACH SVHC list". (including last ECHA update 12-01-2017

    - Chlorinated-, brominated- or fluorinated Hydrocarbons
    - Mineral Oil Saturated Hydrocarbons (MOSH)
    - Mineral Oil Aromatic Hydrocarbons (MOAH)
    - Bisphenol A, S and F
    - Phthalate Plasticisers
    - Naphtalene Plasticisers
    - N-Methylpyrrolidone
    - PVC
    - PAK's (Polycyclic Aromatic Hydrocarbons)
    - Formaldehyde
    - SVHC (Substances of very high concern) 1907/2006/EG (including last ECHA update 12th January 2017)
    - 2-Nonylphenol, 2-Phenylphenol
    - Organotin compounds
    - Boric acid or Boric acid derivatives
    - Perfluorinated organic compounds
    - ITX (Isopropylthioxanthone)
    - Benzophenone
    - 4-Methylbenzophenone
    - Hydroxybenzophenone

However any or all of the above may be present at background trace levels as they would normally
be found to occur in the environment.

Due to the fact that most of the raw materials used in UV Inks and coatings are not fully evaluated under the scope of FDA and the REGULATION (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, the mentioned product above is not a specifically formulated and designated low migration varnish:

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- It is not suitable for primary food packaging.

- Is suitable for secondary food packaging only if the primary packaging contains a functional barrier which reduces the migration of components from any layer on the non-food side of the barrier into the food to ‘acceptable’ levels (specific migration limit SML or migration level of no concern).

The preceding information shall support the manufacturing of safe packaging. The information is given to the best knowledge on basis of the current state of knowledge and depends to some extent on statements and analysis of third parties (e.g. laboratories, providers of commodities); Hi-Tech does not assume any liability for the correctness of the statements and analysis of third parties. The certificate of compliance does not discharge customers and the manufacturer of the packaging from observing all applicable laws, provisions and instructions concerning health and safety, especially not from performing a risk assessment of the particular place of work and a safety assessment regarding food contact as well as the maintenance of a risk management system.

In case of any further questions do not hesitate to contact us.

Hans van ‘t Veen
Regulatory Affairs Manager

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