LONG LIFE FOR ART

Declaration of Compliance

created:	20.12.2018
revised:	13.11.2024
by:	
printed	26.02.2026

1 Supplier and issuer of the Declaration of compliance

Christoph Waller Long Life for Art & Datenlogger-Store e.K., Hauptstrasse 47, 79356 Eichstetten hereby confirms that the product listed under point 2 is delivered in accordance with the declaration of conformity. This confirmation is based on the information provided by our suppliers.

2 Identity of the plastic material or article

Tradename	Polymer type	Material no.
Laminate with aluminum foil	PET/adhesive/Aluminium/ adhesive /LDPE transparent	A30 unprinted
		A30/4 unprinted

3 General provisions

We confirm, that the materials and articles listed in section 2 are suitable as food packaging and meet the relevant requirements laid down in the following Regulation (in each case including all amendments and in the version that is valid at the date of issue of this declaration)

- Regulation (EC) No 1935/2004 (article 3, 11(5), 15, 17)
- Regulation (EC) No 2023/2006

Information about compliance testing with the applicable regulations are given in chapter 7.

3.1 Transition period

Amendments of Regulation (EU) No 10/2011 are published regularly. Plastic materials and articles complying with Regulation (EU) No 10/2011 as applicable before the entry into force of this Regulation may be placed on the market until the end of a transition period which is usually mentioned in the amendment. During the transition period this Declaration of Compliance also relates to the valid version as applicable before the amendment.

3.2 Plastics

We confirm, that the materials and articles listed in section 2 comply with the relevant requirements of **Regulation (EU) no. 10/2011** (in each case including all amendments and in the version that is valid at the date of issue of this declaration).

We confirm

- that the plastics are manufactured only with monomers, other starting substances and additives that are authorised under the Plastics Regulation.
- that the reaction intermediates, degradation or reaction products in plastics detected in the 10 ppb screening comply with the relevant requirements of the framework Regulation and that a risk assessment has been carried out in accordance with Article 19 of the Plastics Regulation.
- that the food contact material complies with the overall migration limit (OML) of 10 mg/dm². Details on the test conditions used in this assessment and the simulant(s) are mentioned in section 7
- that the food contact material complies with organoleptic requirements. Details on the test conditions used in this assessment and the test foodstuffs are mentioned in section 7.

3.3 Further legal provisions

We confirm, that the materials and articles listed in section 2 comply with the relevant requirements of the following Regulations:

3.3.1 Adhesives

- Regulation (EU) no. 10/2011
- BfR Recommendation XXVIII: Cross-Linked Polyurethanes as Adhesive Layers for Food Packaging Materials

3.3.2 Metals, incl. processing aids

- Council of Europe practical guide (2013) on metals and alloys used in food contact materials and articles prepared by the Committee of Experts on Packaging Materials for Food and Pharmaceutical Products (P-SC-EMB)
- DIN EN 602 (Aluminium and aluminium alloys - Wrought products - Chemical composition of semi-finished products used for the fabrication of articles for use in contact with foodstuff)
- CFR 21 § 178.3910 “Surface lubricants used in the manufacture of metallic articles

4 Substances with restrictions

We hereby confirm that the restrictions listed in the following sections are met for all substances for the use specified in section 6.

4.1 List of substances contained with restrictions and/or specifications according to Regulation (EC) no. 10/2011

Substance name	FCM no.	CAS no.	Limit	compliant
ethyleneglycol	227	0000107-21-1	30 [mg/kg food] SML(T)	
formaldehyde	98	0000050-00-0	15 [mg/kg food] SML(T)	
2,4,6-triamino-1,3,5-triazine	239	0000108-78-1	2,5 [mg/kg food] SML	
5-Sulphoisophthalic acid, salts	823	006362-79-4	5,0 [mg/kg food] SML	
terephthalic acid	785	0000100-21-0	7,5 [mg/kg food] SML(T)	
antimony trioxide	398	0001309-64-4	0,04 [mg/kg food] (annex II)	
dodecylbenzenesulphonic acid	658	0027176-87-0	30 [mg/kg food] SML	
diethyleneglycol	263	0000111-46-6	30 [mg/kg food] SML(T)	
isophthalic acid	291	0000121-91-5	5 [mg/kg food] SML(T)	
sodium bisulphite	505	0007631-90-5	10 [mg/kg food] SML(T)	
diphenylmethane-4,4′-diisocyanate	198	0000101-68-8	0,01 [mg/kg food] SML(T)	
2,4-toluene diisocyanate	354	0000584-84-9	0,01 [mg/kg food] SML(T)	
hexamethylene diisocyanate	372	0000822-06-0	0,01 [mg/kg food] SML(T)	
1,1,1-trimethylolpropane	141	0000077-99-6	6 [mg/kg food] SML	
octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	433	0002082-79-3	6 [mg/kg food] SML	
2,6-di-tert-butyl-p-cresol	315	0000128-37-0	3 [mg/kg food] SML	
2,2'-diaminodiphenylmethane	000658	2-52-1	Σ 0,01 [mg/kg food] (annex II)	
2,4'-diaminodiphenylmethane	000120	8-52-2	Σ 0,01 [mg/kg food] (annex II)	
4,4’-diaminodiphenylmethane	000010	1-77-9	0,002 [mg/kg food] (annex II)	
2,4-toluenediamine	0000095-80-7		0,002 [mg/kg food] (annex II)	
2,6-toluenediamine	0000823-40-5		Σ 0,01 [mg/kg food] (annex II)	
hexamethylene diamin	305	0000124-09-4	2,4 [mg/kg food] SML	

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Substance name	FCM no.	CAS no.	Limit	compliant
N,N-bis(2-hydroxyethyl)alkyl (C8-C18) amine	19		1,2 [mg/kg food] SML(T)	
vinylidene fluoride	132	0000075-38-7	5 [mg/kg food] SML	
4-tert-butylphenol	186	0000098-54-4	0,05 [mg/kg food] SML	
hexafluoropropylene	282	0000116-15-4	0,01 [mg/kg food] SML	
1-hexene	356	0000592-41-6	3 [mg/kg food] SML	
2,6-di-tert-butyl-4-ethylphenol	477	0004130-42-1	4,8 [mg/kg food] SML	
phosphorous acid, mixed 2,4-bis(1,1- dimethylpropyl)phenyl and 4-(1,1- dimethylpropyl)phenyl triesters	974	0939402-02-5	10 [mg/kg food] SML *1	
aluminium (Al)		0007429-90-5	1 [mg/kg food] (annex II)	
chromium (Cr)		0007440-47-3	0,01 [mg/kg food] (annex II)	
zinc (Zn)		0007440-66-6	5 [mg/kg food] (annex II)	
zinc stearate (expressed as zinc)	106	0000557-05-1	5 [mg/kg food] (annex II)	
zinc oxide (expressed as zinc)	402	0001314-13-2	5 [mg/kg food] (annex II)	
2,4-di-tert-amylphenol (NIAS)	974	0000120-95-6	1 [mg/kg food] SML	
butadiene (NIAS)	223	0000106-99-0	1 [mg/kg material] (QM)	
tetrahydrofuran (NIAS)	246	0000109-99-9	0,600 [mg/kg food] SML	

For the products listed in section 4, we use materials of different suppliers that contain various substances with limitations. These substances are fully included in the list. Since traceability is ensured at all times, on demand we will give you more information about the substances which are contained in the products supplied to you.

4.2 Substances according to Annex II (identification and amount in an intermediate material)

If substances are intentionally used which are listed in Annex II paragraph 1 of the Plastics Regulation or which could release primary aromatic amines (paa) mentioned in paragraph 2, these are also listed in section 4.1.

4.2.3 elements

Substance name	CAS no.	max. migration in simulant B (worst-case) [mg/kg food]	Limitation [mg/kg food]
aluminium (Al)	0007429-90-5	< 0,1	1
antimony (Sb)	0007440-36-0	< 0,001 (< limit of quantification)	0,04
arsenic (As)	0007440-38-2	< 0,002 (< limit of quantification)	0,01 (ND)
barium (Ba)	0007440-39-3	< 0,003 (< limit of quantification)	1
lead (Pb)	0007439-92-1	< 0,001 (< limit of quantification)	0,01 (ND)
cadmium (Cd)	0007440-43-9	< 0,0003 (< limit of quantification)	0,002 (ND)
chromium	0007440-47-3	< 0,003 (< limit of quantification)	0,01 (ND)
iron (Fe)	0007439-89-6	< 0,1	48

*1 SML expressed as the sum of the phosphite and phosphate forms of the substance, 4-tert-amylphenol and 2,4-di-tert-amylphenol. The migration of 2,4-di-tertamylphenol shall not exceed 1 mg/kg food

Substance name	CAS no.	max. migration in simulant B (worst-case) [mg/kg food]	Limitation [mg/kg food]
europium (Eu)	0007440-53-1	< 0,0003 (< limit of quantification)	0,05 (Σ lanthanoids)
gadolinium (Gd)	0007440-54-2	< 0,0003 (< limit of quantification)	0,05 (Σ lanthanoids)
cobalt (Co)	0007440-48-4	< 0,0003 (< limit of quantification)	0,05
copper (Cu)	0007440-50-8	< 0,002 (< limit of quantification)	5
lanthanum (La)	0007439-91-0	< 0,0003 (< limit of quantification)	0,05 (Σ lanthanoids)
lithium (Li)	0007439-93-2	< 0,003 (< limit of quantification)	0,6
manganese (Mn)	0007439-96-5	< 0,002 (< limit of quantification)	0,6
nickel (Ni)	0007440-02-0	< 0,002 (< limit of quantification)	0,02
mercury (Hg)	0007439-97-6	< 0,0003 (< limit of quantification)	0,01 (ND)
terbium (Tb)	0007440-27-9	< 0,0003 (< limit of quantification)	0,05 (Σ lanthanoids)
zinc (Zn)	0007440-66-6	< 0,1	5

4.2.4 Primary aromatic amines (paa)

No primary aromatic amines appearing in Table 1 of Annex I of Regulation (EU) No 10/2011 are released to food or food simulants above the limits.

None of the following primary aromatic amines are released in a detectable quantity into food or food simulant:

- Substances listed in entry 43 to Appendix 8 of Annex XVII of Regulation (EC) No 1907/2006: detection limit 0.002 mg/kg food or food simulant.
- Sum of primary aromatic amines: detection limit 0.01 mg/kg food or food simulant

The PAAs that may be present as unavoidable trace contaminants according to current knowledge are also listed in the table of part 4.1.

4.3 Further migratable substances (e.g. that are subject to restrictions in national legislation or non-evaluated substances behind a functional barrier)

Substance name	CAS no.	Basis of evaluation	Limitcompliant	
propoxylated glycerine	0025791-96-2	self-derived SML *2	1 [mg/kg food]	
hexane, 1,6-diisocyanato-, homopolymer	0028182-81-2	SR 817.023.21 (annex 10)	0,01 [mg/kg food]	
tris(6-aminohexyl) isocyanurate	1025888-23-6	Toxicolog. evaluation supplier	0,09 [mg/kg food]	*3

4.4 NIAS- non intentionally added substances

The indication of impurities and degradation products (NIAS- non intentionally added substances) is based on a NIAS-screening (limit of quantification 0,01 mg/kg food) with simulant ethanol 95 vol.%, testing conditions

*2 propoxylated glycerine (CAS 0025791-96-2)
- LD50 > 2000 mg/kg bw/day (=low acute oral toxicity potential)
- In vitro tests with propoxylated glycerol and a structurally similar substance do not indicate a genotoxic potential
- NOAEL 160 mg/kg bw/day
- At an exposure of max. 1 mg/kg food (at consumption of 1 kg food/day) no risk is expected according to the supplier

*3 Compliance with the orientation value was not achieved by measuring the specific migration, as neither a standard nor an analysis method is currently available for this substance. The manufacturer of the adhesive has stated that the limit value will not be exceeded if the laminating adhesive is sufficiently cured. The curing of the adhesive was confirmed by testing the primary aromatic amines.

Long Life for Art Christoph Waller Hauptstrasse 47 DE-79356 Eichstetten Tel +49 7663 608990 info@LLFA.de www.LLFA.de

10 days at 60°C *4, measurement by GC/MS-FID; quantities semi-quantitative against internal standard and information from suppliers

Substance (group)/ migration (calculated with EU-cube) [mg/kg food]	**Information and risk assessment according to Article 19 of Regulation (EU) No 10/2011**
alkanes C10-C18 Σ < 2	Typical degradation products of polyolefins; saturated hydrocarbons that are chemically identical to saturated mineral oil hydrocarbons (MOSH - mineral oil saturated hydrocarbons). The German Federal Institute for Risk Assessment (BfR) has derived a guideline value for the transfer to food for solvents containing MOSH with carbon chain lengths from C10 to C16 of **12 mg/kg food** and **4 mg/kg food** from C16 to C20, respectively.
aliphatic saturated and unsaturated hydrocarbons Σ < 2	Oligomers of polyolefins (POSH- polyolefin oligomeric saturated hydrocarbons). Annex I of Regulation (EU) No 10/2011 contains a number of authorised polymeric additives that contain a high proportion of polyolefin oligomers. The substances are listed without limitation. According to the "Research project and risk assessment on polyolefin oligomers" (published by PlasticsEurope on July 5, 2016) the potential migration of oligomers from plastics into food and the associated potential for exposition through food are below the toxicological risk level (level of concern). The Tolerable Daily Intakes (TDIs) derived for the oligomers are sufficiently high (above 1 mg/kg body weight per day) not to be exceeded if the maximum permissible overall migration limit of **60 mg/kg food** is met..
long-chain alcohols ((alcohols, aliphatic, monohydric, saturated, primary (C4-C24) branched and straight-chain (>C24) Σ < 0,2	Can result from oxidation products (e.g. aldehydes) by reduction or by hydrolysis of branched ester compounds. They are metabolized by the body largely like the unbrunched primary alcohols or alcohols with a carbon chain length < C24. In the Union list of Regulation No. 10/2011, long-chain alcohols ((alcohols, aliphatic, monohydric, saturated, straight-chain, primary (C4-C24)) are listed under Ref-33120 without a limit value. As a rule, the homologues with increasing carbon chain length are regarded as less critical, so that the limit value of **60 mg/kg food** can be used for assessment.
2,4-Di-tert-butylphenol (CAS 96-76-4) < 0,2	Typical degradation product of the processing stabiliser tris(2,4-di-tert-butylphenyl)phosphite (CAS 0031570-04-4). According to the protocol of the 21st meeting of the German BfR Commission for Consumer Products from 07th Novemer 2018, the German Federal Environment Agency (UBA) derived a DWPLL value (Drinking Water Positive Listing Limit) of 250 µg/L. Taking into account the usual conversion factor between DWPLL and SML value of 1/20 (water: 2 L per day; 10 % allocation), this results in an evaluation value of **5 mg/kg food**.
Cyclic polyester Σ approx. 0,06	Rearrangement products of polyesters which are converted in the stomach (acidic milieu) and liver to the monomers (alcohols and acids) due to the ester functionality. Within the TTC approach, cyclic esters fall into Cramer Class III, for which an exposure threshold of 1.5 µg/kg body weight per day is set. Applying the consumption model from (EU) No 10/2011 which considers a person of 60 kg body weight, consuming 1 kg of food daily, this value corresponds to **90 µg/kg food** (per individual cyclic ester).
Fatty acid amides Σ < 0,09	Impurities or degradation products of the used slip agent (e.g. erucamide or oleamide). In Annex I (Union list) of Regulation (EU) no. 10/2011 some fatty acid amides are listed without limit others with an SML of **5 mg/kg food**, which can be used for the evaluation of contamination of fatty acid amides

*4 A 10 ppb screening for NIAS (non-intentionally added substancec) is technically not possible with food simulant D2, as the required limit of quantification is not reached in oil. According to the draft of the "Technical guidelines for compliance testing" of the European Commission, Joint Research Centre (JRC), from 2016, a measurement with simulant ethanol 95 vol.% is carried out at a maximum temperature of 60 °C for safety reasons. The draft describes that conditions of 10 d at 60 °C are considered worst case. For combined contact conditions, e.g. 2 h at 121 °C followed by 10 d at 60 °C, the test should not be carried out for 18 d at 60 °C, but only for 10 days at 60 °C.

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Substance (group)/ migration (calculated with EU-cube) [mg/kg food]	**Information and risk assessment according to Article 19 of Regulation (EU) No 10/2011**
fatty acid nitriles approx. 0,02	Impurities or degradation products of the used slip agent (e.g. erucamide or oleamide). According to the ECHA registration dossier (category approach for alkylnitriles C-10 to C-16), the group shows no evidence of genotoxic potential. From the total NOAEL of 50 mg/kg body weight and day, an assessment value of **5 mg/kg food** can be derived, taking into account conversion factors when applying the consumption model from Regulation (EU) No. 10/2011, which assumes a person with 60 kg body weight consuming 1 kg of food per day. According to Toxtree 3.1.0 ("Cramer rules, with extensions") alkylnitrils may possibly be classified in Cramer Class III for which an exposure threshold of 1.5 µg/kg body weight per day is set. Applying the consumption model from (EU) No 10/2011 which considers a person of 60 kg body weight, consuming 1 kg of food daily, this value corresponds to an evaluation value of **0,09 mg/kg food**
Tris(2,4-di-tert-butylphenyl)phosphate (CAS 95906-11-9) < 1	Oxidation product of Tris(2,4-di-tert-butylphenyl)phosphit which is listed without limit in Regulation (EU) no. 10/2011. Phosphates are usually considered less critical than phosphites, so that an evaluation value of **60 mg/kg food** can be used.
NIAS and not clearly identified substances which are attributable to the mixture CAS 939402-02-5 approx. 1,4 (thereof 2,4-di-tert-amylphenol approx. 0.03)	The mixture “phosphorous acid, mixed 2,4- bis(1,1- dimethylpropyl)phenyl and 4-(1,1- dimethylpropyl)phenyl triesters” (CAS 939402-02-5) is listed with an SML of **10 mg/kg food** calculated as the sum of the phosphite and phosphate forms of the substance and of 4-tert-amylphenol and 2,4-di-tert-amylphenol. The migration of 2,4-di-tert-amylphenol shall not exceed 1 mg/kg food. Since the limit value also refers to the degradation products, it can be used for the evaluation.
Unidentified substance approx. 0,07	Assuming that the substance shows no structural warning for genotoxicity, an increased threshold of 90 µg/person/day (90 ppb or **0,09 mg/kg food** when consuming 1 kg packaged food/day by an average person with a body weight of 60 kg) can be derived according to the TTC concept (see: “Review of the Threshold of Toxicological Concern (TTC) approach and development of new TTC decision tree, European Food Safety Authority and World Health Organization, 16 February 2016).

4.5 Intended used substances whose genotoxicity has not been excluded

No substances are used, whose genotoxicity has not been ruled out and which result from the intended use at a manufacturing stage of this intermediate material and could be present in an amount where migration from the finished material of more than 0.00015 mg/kg food or food simulant is to be expected.

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5 Substances which are subject to a restriction in food (Dual-use additives)

According to the information provided by the manufacturers of the raw materials, the following food additives according to Regulation (EC) No 1333/2008 or flavourings according to Regulation (EC) No 1334/2008 are used or may be present in the material in traces:

Substance name	FCM no.	CAS no.	E- or FL-no
sodium bisulphite	505	0007631-90-5	E223
butylated hydroxytoluene	315	0000128-37-0	E321
calcium carbonate	21	0000471-34-1	E170
silicon dioxide	504	0007631-86-9	E551
talc	615	0014807-96-6	E553b
aluminium (Al)		0007429-90-5	E173
carbon dioxide	307	0000124-38-9	E290
magnesium chloride	507	0007786-30-3	E511
n-butan	221	0000106-97-8	E943a
calcium salts of edible fatty acids	-	-	E470a
polyethylene glycol	638	0025322-68-3	E1521

6 Information related to the final use

Use as	packaging film
Type or types of food	all kind of foodstuff
Ref no. food category	different
Hot-fill conditions and/or heating up	70 °C ≤ T ≤ 100 °C, contact time max. t = 120/2^((T-70)/10) min
Storage temperature [°C]	room temperature
Shelf life/ storage time	long term storage
Preparation in the packaging	not provided
Max. surface / volume ratio	unknown (evaluation with max. 6dm²/kg food)

7 Tests

For the verification of conformity, in some cases stricter test conditions than those listed here or screening procedures according to Annex V of the Plastics Regulation (EU) 10/2011 are applied, which covers the test conditions listed below. There is scientific evidence that the substitute food simulants result in migration that is at least as severe as migration that would be obtained using the food simulants specified.

7.1 Overall migration (OM)

food simulant	test conditions (time/temperature)	tested	comment
A (ethanol 10% (v/v))	OM2 (10 d/40 °C)		-
B (acetic acid 3% (w/v))	OM2 (10 d/40 °C)		-
D2 (vegetable oil)	OM2 (10 d/40 °C)		-

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7.2 Specific migration (incl. sceening for NIAS, paa etc.)

food simulant	test conditions (time/temperature)	tested	comment
A (ethanol 10% (v/v))	10 d / 60 °C		-
B (acetic acid 3% (w/v))	10 d / 60 °C		-
D2 (vegetable oil)	10 d / 60 °C		-
Ethanol 95% (v/v)	10 d / 60 °C		NIAS Screening GC-MS/FID

7.3 Sensory

The transfer of sensory perceptible substances from the food contact material to test substances according to DIN 10955 falls below the grade 3 when tested with test foodstuffs

test foodstuffs	test conditions (time/temperature)	tested	comment
water	24 h / 23 °C		taste
Intrinsic odour	24 h / 23 °C		odour

Since food can differ widely in its composition, we remind you that the manufacturer of the finished food contact material or article must verify that the finished material or article does not modify the organoleptic properties of the food.

8 Functional barrier

No substances are used that may only be used behind a functional barrier.

9 Supporting documents

This Declaration of Compliance relies on the information provided by the producer for evaluation and testing, the testing performed or calculations as well as the compliance certificates of the raw material suppliers.

Report	Date	Title
BA 22537, Innoform GmbH	28.08.2018	test report
BA 24055, Innoform GmbH	22.07.2019	test report
BA 33490-A, Innoform GmbH	24.04.2024	conformity status
BA 33490, Innoform GmbH	26.03.2024	test report
BA 34665, Innoform GmbH	27.08.2024	test report
BA 34835, Innoform GmbH	01.10.2024	test report
BA 35120, Innoform GmbH	13.11.2024	conformity status

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Tobias Sommer

CHRISTOPH WALLER
Long Life for Art & Datenlogger-Store e.K.
Hauptstr. 47 | 70356 Eichstetten | Germany
Tel: +49 (0)7663 - 608 990

This confirmation applies to the product supplied by us as described. Regulation (EU) No. 10/2011 provides guidance on the selection of test conditions to be applied for various foodstuffs. According to this, the product fulfils the specifications of this regulation for the packaging of the specified filling goods when the specified food contact conditions are observed. The user must convince himself of the suitability of the product for the intended filling good beyond the specifications of the regulation.