

## **Declaration concerning non intentional use of various substances (Toxic heavy metals, Bisphenols, PFAS, Phthalates, etc)**

This is to confirm that in the manufacture of the following sheet-fed printing inks and varnishes

### **Mineral-oil-free standard offset inks**

- **RESISTA RS250, REFLECTA RL250, RAPIDA ECO RPE250, QU!CKFAST QF250/260, ECO PERFECT DRY EP350, PACIFICA PC250, ECO SMART ES250, PACKAGING PLUS PK350, ALPHA APxxx (all types)**
- **CRSmax Base inks QX and QFX**
- **Standard sheetfed spot colours**

### **MGA® offset inks recommended for the manufacture of food contact materials (printed on the non-food contact side)**

- **MGA® CORONA Process printing inks and spot colours (all types)**  
**MGA® CORONA CRSmax Base inks**
- **MGA® NATURA Process printing inks and spot colours (all types)**  
**MGA® NATURA CRSmax Base inks**
- **MGA® Label Process printing inks and spot colours (all types)**  
**MGA® Label CRSmax Base inks**
- **TINKREDIBLE MGA® Process printing inks and spot colours (all types)**  
**TINKREDIBLE MGA® CRSmax Base inks**

### **ACRYLAC and ACRYLAC-MGA® water-based varnishes**

labelled with the **hubergroup** brand and supplied by European companies, the following substance(s) or groups of substances, as well as raw materials containing these substance(s) (according to information from our raw material suppliers), are not intentionally used:

### **EuPIA Exclusion Policy for Printing Inks and Related Products<sup>1</sup>**

This is to confirm that in the manufacture of printing inks, varnishes and related products labelled with the **hubergroup** brand and supplied by European companies, the “EuPIA Exclusion Policy for Printing Inks and Related Products” is strictly obeyed.

This implies that substances classified as Carcinogenic, Mutagenic or Toxic for Reproduction Category 1A and 1B, as listed in the Exclusion Criteria Group A and B, are excluded as raw materials for the manufacturing of printing inks and related products.

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<sup>1</sup> Current version, see [www.eupia.org](http://www.eupia.org)

However, the presence of trace amounts in the product(s) coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded.

### **Toxic heavy metals**

We confirm that the total content of the toxic heavy metals **lead (Pb)**, **cadmium (Cd)**, **mercury (Hg)** and **hexavalent chromium (Cr(VI))** in printing inks, varnishes and printing additives labelled with the **hubergroup** brand and supplied by European companies is below the CONEG limit of 100 mg/kg.

In the manufacture of printing inks, varnishes and related products labelled with the **hubergroup** brand and supplied by European companies, raw materials based on the toxic heavy metals mentioned above are not used as intentionally added ingredients.

All member companies of the **hubergroup** strictly follow the EuPIA Exclusion Policy ([www.eupia.org](http://www.eupia.org)) which excludes the use of such materials.

According to information from our raw material suppliers, the total content of the toxic heavy metals mentioned above in the materials supplied is below 100 mg/kg.

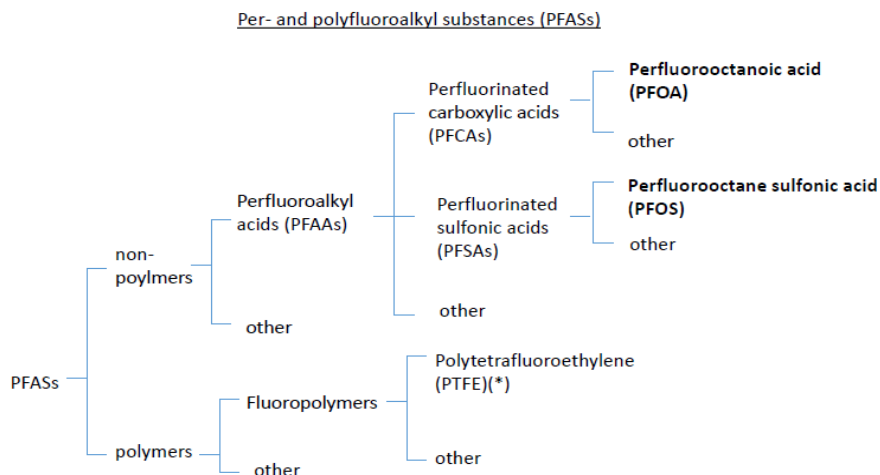
However, the presence of trace amounts in the product(s) coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded. To monitor the presence of trace amounts of toxic heavy metals, we perform spot sample analyses of the printing inks supplied at regular intervals. These analyses show that the actual content is very much lower than the CONEG limit.

According to **Directive 94/62/EC on Packaging and Packaging Waste**, the total content of the toxic heavy metals lead, cadmium, mercury and chromium (VI) in packaging or packaging material shall in sum not exceed the limit of 100 mg/kg. Thus, the use of products labelled with the **hubergroup** brand and supplied by European companies is not an obstacle for the compliance of the packaging or packaging material with Directive 94/62/EC.

The 100 mg/kg limit mentioned above is also referenced by the "Model Toxics in Packaging Legislation" maintained by the "Toxic in Packaging Clearinghouse" (TPCH) which is supported by a group of US member states.

### **Perfluoroalkylated substances (PFAS)**

Per- and polyfluoroalkyl substances (PFAS) are a large group of man-made chemicals which includes e.g. perfluorooctane sulfonic acid (PFOS, CAS-No. 1763-23-1) and perfluorooctanoic acid (PFOA, CAS-No. 335-67-1).



This is to confirm that per- and polyfluoroalkyl substances (PFAS), with the exception of PTFE wax, are not intentionally used in the manufacture of printing inks and related products labelled with the **hubergroup** brand and supplied by European member companies of the **hubergroup**.

In the manufacture of few of the printing inks and varnishes mentioned above waxes containing or based on polytetrafluoroethylene (PTFE) are intentionally used. Technical qualities of PTFE may contain traces of perfluorooctanoic acid (PFOA) as an impurity. We confirm that according to the information given by our suppliers, the PTFE waxes used in the manufacture of the printing inks and varnishes mentioned above are compliant with the provisions laid down in Regulation (EU) No 2017/1000 (amending the EU REACH Regulation) which prohibit the placing on the market of substances or mixtures containing more than 25 ppb of PFOA including its salts, or 1000 ppb of one or a combination of PFOA-related substances.

In the manufacture of **MGA**<sup>®</sup> printing inks and varnishes for food contact materials PTFE wax is not used.

## Bisphenol A and related substances

The following bisphenols are not intentionally used in the manufacture of the above mentioned products.

Substance group	Substance name	CAS-No.
Bisphenols	Bisphenol A	80-05-7
	Bisphenol AP	1571-75-1
	Bisphenol AF	1478-61-1
	Bisphenol B	77-40-7
	Bisphenol BP	1844-01-5
	Bisphenol C	79-97-0
	Bisphenol C2	14868-03-2
	Bisphenol E	2081-08-5
	Bisphenol F	620-92-8
	Bisphenol G	127-54-8
	Bisphenol M	13595-25-0
	Bisphenol S	80-09-1
Bisphenol P	2167-51-3	

Bisphenol PH	24038-68-4
Bisphenol TMC	129188-99-4
Bisphenol Z	843-55-0
Other bisphenols	-

Commission Regulation (EU) 2018/213 of 12 February 2018 amending Regulation (EU) No 10/2011 sets the specific migration limit (SML) for Bisphenol A (BPA) from plastic food contact materials (FCM) or from varnishes or coatings applied to FCM to 0.05 mg/kg foodstuff.

We can confirm that the use of **MGA**<sup>®</sup> printing inks and varnishes for the manufacture of food contact materials is not an obstacle for the compliance of the printed/coated packaging material with the provisions of Regulations (EU) No 1935/2004 and 10/2011.

Finally, In the manufacture of the above mentioned product(s), bisphenol A di-glycidyl ester (BADGE) or other epoxy derivatives which are subject to Regulation (EC) No. 1895/2005 of 18. November 2005 are not intentionally added.

## Biocides

The Biocidal Products Regulation [Regulation (EU) No. 528/2012, "BPR"] came into force in June 2012. It replaces the former Biocidal Products Directive 98/8/EG. The new labelling provisions of the BPR apply from 1 Sept 2013 on.

The Regulation covers not only biocide products (which were already in scope of the previous Directive), but also "treated articles". In the BPR Regulation, "treated articles" are defined as "any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products". Unless otherwise explicitly claimed, "treated articles" are not considered biocidal products.

In the manufacture of many water-based ACRYLAC varnishes supplied by member companies of the **hubergroup**, raw materials are used which contain small amounts of biocides to stabilise the products against microbial deterioration. Hence ACRYLAC products are regarded "treated articles", according to the BPR. The biocide products present are approved for the purpose of in-can preservation (PT6). Hence, our biocide-containing products do not have a biocidal function and do not fall under the definition of biocide.

In the manufacturing of above mentioned non-water-based products (mineral oil-free standard offset inks and MGA offset inks), biocides are not intentionally added.

## Allergenicity

In the manufacture of the above mentioned **MGA**<sup>®</sup> offset inks and **ACRYLAC-MGA**<sup>®</sup> water-based varnishes, which are designed and recommended for use on food packaging, foodstuffs and materials listed in **annex II** of **Regulation (EU) No 1169/2011**, as well as raw materials based on these foodstuffs and materials, are not used.

The following foodstuffs or materials are listed in Annex II:

1. Cereals containing gluten, and products thereof
2. Crustaceans and products thereof
3. Eggs, egg yolk, egg protein and products thereof
4. Fish and products thereof
5. Peanuts and products thereof
6. Soybeans and products thereof (except fully refined soybean oil and fat)
7. Milk and products thereof (including lactose)
8. Nuts and products thereof
9. Celery and products thereof
10. Mustard and products thereof
11. Sesame seeds and products thereof
12. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre
13. Lupin and products thereof
14. Molluscs and products thereof

Furthermore, the following substances with allergenic potential listed in the **ALBA database** (V2.0 2011) are not used: Pulses and Legumes; Products made from beef, pork, or chicken meat; Coriander (cilantro); Carrot; Cocoa; Corn and corn products; Glutamate (E620 - E625).

Furthermore, the following substances with allergenic potential listed in the US Food Allergen Labeling and Consumer Protection Act (FALCPA) are not used: Milk, egg, fish, crustacean shellfish, tree nuts (including coconuts), wheat, peanuts, and soybeans; as well as any ingredients that contain protein derived from one of these foodstuffs (except highly refined oil, and any ingredient derived from such highly refined oil).

We want to add that neither the printed/coated surface of the food packaging nor the wet ink or varnish are intended to come into contact with foodstuffs, or to become part of foodstuffs.

## Endocrine Disruptors

The EU strategy for endocrine disruptors includes the task of compiling a candidate list of potential endocrine disruptors<sup>2</sup>.

The Annex 13 to the BKH Report to the European Commission lists 146 substances with endocrine disruption categorizations<sup>3</sup>. These substances are to be studied further for endocrine-disrupting properties.

This is to confirm that substances listed in the Annex 13 of the BKH Report are not intentionally used in the manufacture of printing inks, varnishes and related products labelled with the **hubergroup** brand and supplied by European companies.

However, the presence of trace amounts in the product(s) coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded.

## Conflict Minerals

This is to confirm that "conflict minerals" as defined according to section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

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<sup>2</sup> [http://ec.europa.eu/environment/chemicals/endocrine/strategy/being\\_en.htm](http://ec.europa.eu/environment/chemicals/endocrine/strategy/being_en.htm)

<sup>3</sup> [http://ec.europa.eu/environment/archives/docum/pdf/bkh\\_annex\\_13.pdf](http://ec.europa.eu/environment/archives/docum/pdf/bkh_annex_13.pdf)

- columbite-tantalite (coltan) [(Fe,Mn)Nb<sub>2</sub>O<sub>6</sub>]-[(Fe,Mn)Ta<sub>2</sub>O<sub>6</sub>]
- cassiterite (SnO<sub>2</sub>)
- gold (Au)
- wolframite ((Fe,Mn)WO<sub>4</sub>)

as well as the metals

- tantalum (Ta)
- niobium (Nb)
- tin (Sn)
- tungsten (W)

which are obtained from these minerals, are not used in the production of the above mentioned products.

## Dioxins and Furans

"Dioxins" (chlorinated dibenzodioxins and dibenzofurans) are neither produced commercially nor used intentionally in any technical process. However, using advanced analytical techniques, traces of dioxins can be found as impurities in many products and environmental samples.

Under the conditions of production or application of printing inks, the generation of dioxins can be excluded.

Analytical testing of commercial printing inks showed that the trace amounts of dioxins found (due to the raw materials used) were clearly below the strict limits set by the German Chemikalienverbotsverordnung.

From that, and considering the low proportion of ink on a printed article, it can be stated that the contribution of printing inks to the potential dioxin content of a printed article is negligible.

## Engineered Nanoparticles

This is to confirm that in the manufacture of the above mentioned products, nanotechnology or engineered nanoparticles are not intentionally used. The intended use of the products is not expected to result in nanoparticles being isolated or released. The handling of said printing inks and varnishes as intended will not result in exposure of workers or general public to nanoparticles.

Some proportion of pigments, fillers and binders used in the manufacture of printing inks may be smaller than 100 nanometers. These are not engineered nanoparticles, but present as part of the typical particle size distribution of the solid materials used.

In liquid inks and varnishes as well as in dried ink and varnish films, the particles are bound in a liquid or solid matrix, which prevents any release of free nanoparticles. Under normal or reasonably foreseeable conditions of use, nanoparticles are not likely to be released from the printed film and, in the specific case of food packaging material, have been shown to not migrate into the packed foodstuff<sup>4</sup>.

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<sup>4</sup> [https://www.eupia.org/fileadmin/user\\_upload/DLR\\_nanoscale\\_pigment\\_particles.pdf](https://www.eupia.org/fileadmin/user_upload/DLR_nanoscale_pigment_particles.pdf)

## Genetically modified organisms (GMO)

This is to confirm that in the manufacture of above mentioned products, genetically modified organisms (GMO) are not used.

In the manufacture of the above mentioned products, ingredients derived from genetically modified crops are not used, with the exception of soybean oil or of certain resins or additives modified with, or synthesised from, soybean oil fatty acids.

Most of the technical soybean oil in the market comes from genetically modified (GM) plants. However, soybean oil fatty acids and fatty acid modified resins or additives are not organisms (GMO), but materials, and they do not contain any parts of the genetically modified plant.

Printing inks and varnishes are neither foodstuffs nor food additives. Dried ink and varnish films are not intended to come into contact with foodstuffs or to transfer their constituents to food in relevant amounts. As a consequence, with respect to the packaged food, the presence of substances from genetically modified plants in printing inks and varnishes should be of minimum concern.

The 0,9% labelling obligations of Commission Regulation (EC) No. 1829/2003 (Art. 12) and Directive 2001/18/EC (Art. 21) (amended by Regulation (EC) No. 1830/2003) refer to the content of genetically modified material in food, not in packaging material or ink.

## Mineral Oil Hydrocarbons (MOH)

Mineral oil hydrocarbons (MOH) as well as raw materials containing MOH (according to information from our raw material suppliers) are not intentionally used in the manufacture of the aforementioned inks. The above-mentioned inks are compliant with the French CITEO requirement (MOH below 1% w/w in the printing ink).

Hydrocarbons from mineral oil can be analytically differentiated in two different fractions: MOSH (mineral oil saturated hydrocarbons) and MOAH (mineral oil aromatic hydrocarbons). In addition to the mineral oil fractions MOSH and MOAH, hydrocarbons coming from polyolefins (e.g. polyethylene) with structures similar to MOSH, should be distinguished.

In the manufacture of the aforementioned inks, polyethylene waxes are used which contain very low amounts of polyethylene oligomers which can be identified analytically as POSH (polyolefin oligomeric saturated hydrocarbons) and may interfere with MOSH analysis. All grades of waxes used have been evaluated for food contact, are listed in Annex I of the Plastic Regulation (EU) No 10/2011, and are mentioned in the "Statement of Composition" of the respective ink series.

The presence of trace amounts of the hydrocarbon fractions mentioned coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded. However, the amount of MOSH, MOAH, and POSH in printed products coming from the inks is expected to be negligible.



## Persistent organic pollutants (POP)

Persistent organic pollutants (POP) as listed in Commission Regulation (EU) 2019/1021 (repealing the previous Regulation (EC) No 850/2004) or raw materials containing these (according to the information from our raw materials suppliers) are not intentionally used in manufacture of the above mentioned products and are not expected to be present.

However, the presence of trace amounts in the product(s) coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded.

## Radioactivity and irradiation treatments

Radioactive substances or raw materials containing these according to information from our raw material suppliers, are not intentionally used in the manufacture of printing inks, varnishes and related products labelled with the hubergroup brand and supplied by European companies.

On the basis of our knowledge of the raw materials used in the manufacture of the products labelled with the hubergroup brand, we do not expect their detectable radioactivity to exceed the natural background radiation.

Additionally, during the manufacturing and storage of our products in our premises, irradiation treatments (e.g. gamma rays) for sterilization or other purposes are not used.

## Substances of Animal Origin / Fermentation

This is to confirm that

- alcohols obtained by fermentation
- materials obtained by fermentation
- fermentation residues
- substances of animal origin (e.g. tallow, fat, beeswax, honey, milk, casein, lactose, horn, wool, lanolin, leather, hide, gelatin, or cochénille red),

are not used as intentionally added ingredients in the manufacture of the product mentioned above, labelled with the **hubergroup** brand and supplied by European companies and recommended for food packaging applications.

However, the presence of trace amounts of these substances in the products coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded.

Exception: Some pigments used in inks of specific colour shades (e.g. metallics) may contain small amounts of synthetic additives, which have been manufactured from fatty acids of animal origin.

Inks contribute for a small amount of the total packaging weight only, and the packaging itself is never designed to become intentionally part of the food. Therefore,



it can reasonably be expected that the impact of any amount of substance of animal or fermentation origin, which might be associable to printing ink ingredients, be negligible.

## Various substances or groups of substances

The following substances or groups of substances as well as raw materials containing these substances (according to information from our raw material suppliers), are not intentionally used in the manufacture of the above mentioned products.

Substance group	Substance name	CAS No
Phthalate plasticizers	n-butyl benzyl phthalate (BBP)	00085-68-7
	Dibutyl phthalate (DBP)	00084-74-2
	Diethylhexyl phthalate (DEHP)	00117-81-7
	Diethyl phthalate (DEP)	00084-66-2
	Diisobutyl phthalate (DIBP)	00084-69-5
	Diisodecyl phthalate (DIDP)	26761-40-0
		68515-49-1
	Diisononyl phthalate (DINP)	28553-12-0
		68515-48-0
	Dimethylglycol phthalate (DMEP)	00117-82-8
	Di(n-octyl) phthalate (DNOP)	00117-84-0
	Dipentyl phthalate (DPEP)	00131-18-0
	Didecyl phthalate (DDP)	00084-77-5
	Dicyclohexyl phthalate (DCP)	00084-61-7
	Dimethyl phthalate (DMP)	00131-11-3
	Ditridecyl phthalate (DTDP)	00119-06-2
	1,2-Benzenedicarboxylic acid, dipentyl ester, branched and linear	84777-06-0
	1,2-Benzenedicarboxylic acid, bis(2-methylbutyl) ester	42925-80-4
	Any other phthalate	-
	Perchlorate	14797-73-0
2-ethoxyethanol	110-80-5	
2-methoxyethanol	109-86-4	
N-methyl-2-pyrrolidone	872-50-4	
Benzene	71-43-2	
Toluene	108-88-3	
Xylene (mixture of isomers)	1330-20-7	
Ethylbenzene	100-41-4	
Methylethylketone (MEK, 2-butanone)	78-93-3	
Organotin compounds (Organostannic compounds)	Various	
Polymers	Graphite	7782-45-5
	Polycarbonate	Various
	Polyhydroxyalkanoates	Various
	Poly(lactic acid)	26100-51-6
	Latex (natural Rubber)	
	Dimethylformamide (DMF)	68-12-2
	Dimethyl fumarate (DMF)	624-49-7
	Benzothiazole	95-16-9
2-Mercaptobenzothiazole (MBT)	149-30-4	

Epoxyxilanes	trimethoxy[3-(oxiran-2-ylmethoxy)propyl]silane (GLYMO)	2530-83-8
	Any other epoxyxilane	Various
Flame Retarders	TCEP	115-96-8
	T CPP	13674-84-5
	TDCP/TDCPP	13674-87-8
	decaBDE	1163-19-5
	HBCD	3194-55-6
	TBBPA	79-94-7
	Phenol, isopropylated, phosphate (3:1)	68937-41-7
	Other flame retarders	various
Quaternary ammonium compounds	Melamine	108-78-1
	Benzalkonium chloride (BAC)	8001-54-5
	Didecyldimethylammonium chloride (DDAC)	7173-51-5
	1-(3-Chloroallyl)-3,5,7-triaza-1-azoniaadamantane chloride (Quaternium 15, all isomers)	Various
Recycled plastic materials (e.g. PP recyclates, PA12 recyclates, PC recyclates)		Various
Cells, tissues or products of human origin		Various
	Formaldehyde	50-00-0
substances of animal origin associated with bovine spongiforme encephalopathy (BSE)		Various
substances of animal origin associated with transmissible spongiforme encephalopathies (TSE)		Various
	Sulphur	7704-34-9
Sulphites		(various)
Antimony and its compounds		Various
Arsenic and its compounds		Various
Cobalt and its compounds		Various
Semicarbazide and related substances	Semicarbazide	57-56-7
	Substances from which semicarbazide can be formed	Various
	Titanium Acetyl Acetate	17501-79-0
	Anthraquinone	84-65-1
	Asbestos	
azo colorants (pigment and dyes) which can decompose in the body to bio-available carcinogenic <sup>5</sup> aromatic amines		Various
	Cyanuric acid	108-80-5
Ozone depleting substances		Various
Organic peroxides		Various

<sup>5</sup> of Category 1A and 1B according to the CLP Regulation (EC) No. 1272/2008

	Epichlorohydrin	106-89-8
	1,2-Thiazol-3-ol	1003-07-2
Chlorinated paraffins		various
	Methyl 4-hydroxybenzoate	099-76-3
	Ethyl 4-hydroxybenzoate	120-47-8
Parabens (esters of para-hydroxybenzoic acid)	Propyl 4-hydroxybenzoate	094-13-3
	Butyl 4-hydroxybenzoate	094-26-8
	Any other paraben	Various
	Acrylonitrile	107-13-1
	Triclosan	3380-34-5
	2,4,6-tris(tert-butyl) phenol	732-26-3
	Pentachlorothiophenol	133-49-3
	Hexachlorobutadiene	87-68-3

However, the presence of trace amounts in the product(s) coming from raw material impurities, from the process or as adventitious contaminant cannot be excluded.

Disclaimer: The information contained herein is based upon data believed to be up-to-date and correct at the time of writing. It is provided to our customers in order to enable them to answer specific customer requests. Since the application of the inks and the conditions of use are beyond our control, the information provided does not represent a guarantee of any kind for the final printed product.

Kirchheim, 13 August 2021

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