



REGULATORY INFO & MATERIAL COMPLIANCE

REGULATORY INFORMATION FOR MATERIALS USED IN FLEXIBLE PACKAGING MANUFACTURING

This document outlines areas of compliance specific to the materials used in the manufacturing processes at Farnell Packaging Limited. Materials used at our facility are selected based on compliance requirements for the industries we supply, most notably the food industry and applications with direct food contact packaging.

RESINS & FILMS

CFIA (CANADIAN FOOD INSPECTION AGENCY)

Farnell Packaging Limited's film blends and resin codes are compliant with all CFIA regulations for direct food contact. **In the case of materials intended for use in federally registered food establishments operating under Regulations that are administered by the CFIA, manufacturers and suppliers of food packaging materials should be aware that as of July 2, 2014 the CFIA no longer requires industry to pre-register packaging materials in the "Reference Listing of Accepted Construction Materials, Packaging Materials and Non-Food Chemical Products". However, as part of our ongoing compliance with this program, Farnell's resin codes and film blends are periodically submitted to Health Canada to request Letters of No Objections (LONO), acceptability of the film for use in food packaging applications.**

For those blends that have not changed, follow the link below to find the CFIA website, then select "packaging materials" in the first drop-down menu and "food contact" in the second drop-down menu. Our products run from page 205-208.

CFIA website: <https://food-nutrition.canada.ca/food-safety/referencelist/index-en.php#>

FDA (FOOD AND DRUG ADMINISTRATION)

Resins used by Farnell Packaging Limited to manufacture polyethylene films comply with the provisions of the United States Federal Food, Drug and Cosmetic Act which are applicable to the resin, and all applicable Food and Drug Administration (FDA) regulations. The resins comply with the specifications contained in the U.S. Food and Drug Administration (FDA) regulation 21 CFR 177.1520 for olefin polymers, para. (c) 3.2a, and may thus be used in the United States as an article or component of an article intended for use in direct contact with food.

EU (EUROPEAN UNION)

Resins used by Farnell Packaging Limited to manufacture polyethylene films comply with the European Union's direct food contact regulations. **Commission Regulation (EU) No 10/2011, as amended up to Regulation (EU) 2020/1245, relating to plastic materials and articles intended to come into contact with food.**

The composition of the polyethylene films supplied by Farnell Packaging complies with the European Union's food contact regulations:

- Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food (including Article 3 – General Requirements; Article 17 – applicable traceability requirements).
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food as amended.
- This material has been manufactured in accordance with the relevant requirements of these regulations as well as requirements for ISO 9001:2015 Quality Management System and the IFS PACSecure certification.

EU REACH

None of the resins in our film meet the current criteria for Authorization under the European Union's REACH Regulation (EC) No. 1907/2006.

MIGRATION TESTING

Overall Migration testing has been conducted in accordance with the current FDA/Health Canada and EU/2011 European Union guidances. Sections of samples are cut and placed in customer stainless steel (SS) extractions cell designed according to the FDA specifications for food contact packaging testing. The cell is composed of two SS plates which sandwich a Teflon gasket assembly. The gasket isolates only the food contact surface for extraction and contains a cavity to hold the extracting solvent. The surface area exposed for extraction within the cavity is 51 sqcm (7.9 sqin) and 80 mL of food simulant. Therefore, the solvent volume surface area ratio is 1.57 mL/sqcm or 10 mL/sqin (default FDA guidance). The samples are extracted as per FDA and EU 10/2011 specific condition of Use.

FOOD ALLERGENS

Farnell Packaging Limited has written notifications from our resin and material suppliers that they do not deliberately add Food Allergens to products supplied to Farnell Packaging Limited, nor are these substances present, to the best of our knowledge, in any of the raw materials used in the manufacture of our products. While we have not specifically analyzed for the presence of allergens, we have no reason to suspect that they would be present in any material supplied by Farnell Packaging Limited.

TALLOW DERIVED SUBSTANCES; KOSHER/HALAL, BSE (BOVINE SPONGIFORM ENCEPHALOPATHY), AND TSE (TRANSMISSIBLE SPONGIFORM ENCEPHALOPATHY)

Farnell Packaging Limited does not deliberately add any animal derived substances, kosher/halal offending substances, or any animal substances that may carry the risk of transmitting BSE or TSE, nor are such substances present, to the best of our knowledge, in any raw material used in the manufacture of the film. While we do not have Kosher/Halal certification, you should anticipate no difficulty in obtaining such a certification.

BPA (BISPHENOL A)

There is no BPA in any product manufactured at Farnell Packaging Limited.

CALIFORNIA PROPOSITION 65

Please be advised that the resins used to manufacture our film do not contain substances listed on California's Proposition 65 chemicals listing, known to the State of California to cause cancer or reproductive toxicology.

FLUORINATED COMPOUNDS AND POLYVINYL CHLORIDE (PVC)

We can advise that we do not deliberately add to our film those PFAS of the greatest concern, namely perfluorooctanoic acid (PFOA), perfluorooctyl sulfonates (PFOS), or the five perfluoroalkyl PFAS banned from food contact applications in 2016 by the US, FDA; nor such PFAS present, to the best of our knowledge, in any of the raw materials used in the manufacture of the resin. Farnell Packaging does not use Polyvinyl Chloride (PVC) in any resin blends or films. Polyvinyl Chloride (PVC), perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA), perfluorochemicals (PFC) and/or other fluorocarbon substances are not intentionally used in the manufacture of our resins, and therefore, we do not perform specific testing for these materials.

IRRADIATION

The films produced at Farnell packaging are not subjected to irradiation.

NANOTECHNOLOGY

The food packaging products supplied by Farnell Packaging are not formulated with raw materials known or expected to contain Nano-engineered materials. Nor do the manufacturing processes used to produce our food packaging products use Nano-engineered materials.

PHATALATE

The manufacturing process used at Farnell Packaging does not include raw materials (resins, additives, or processing aids) known to contain phthalates. Specific phthalates DINP (Di-Isononyl Phthalate), DIDP (Diisodecyl Phthalate), DEHA (Bis(2-ethylhexyl) adipate), DEHP (Bis(2-ethylhexyl) phthalate), DBP (Dibutyl phthalate), BBP (Benzyl Butyl Phthalate), DNOP (Di-n-Octyl Phthalate) and DnHP (Di-n-hexyl phthalate) are not known to be intentionally added to the raw materials used in the manufacture of films at Farnell Packaging Limited.

INKS, ADHESIVES & PRINTING MATERIALS

All printing inks used by Farnell Packaging Limited are approved by the CFIA, FDA, and EU for indirect food contact. Generally speaking, Farnell Packaging Limited uses two different printing processes that supports the indirect food contact approval:

“Surface Printed” where inks are printed on film that will become the outside of the packaging. Food is packed on the inside and therefore has no direct contact with the inks).

“Inside Reverse Printed” where inks are printed in reverse on the inside of the film. Following this, the film is laminated to a second and separate substrate or film. This traps the ink between two layers of material, preventing any direct food contact with the printed ink.

CONEG

(Model Toxics in Packaging Legislation by the Coalition of Northeast Governors Policy Research Center):

All of the flexographic printing inks and adhesives used by Farnell Packaging Limited comply with the CONEG Heavy Metals Legislation.² All inks used comply with the 100-ppm aggregate incidental contaminant level required under CONEG 16CFR1303 Ban on Lead. All inks used contain less than 0.06% by weight of lead in ink solids and comply with the 16CFR1303 Ban on Lead

FRAUD ASSESSMENT

A documented product fraud vulnerabilities assessment has been undertaken on all raw materials to determine the risk of fraudulent activity in relation to substitution, mislabeling, adulteration or counterfeiting.

SUSTAINABILITY

Farnell's facility holds an active certification with the Sustainable Green Printing Partnership (SGP). SGP is a non-profit organization that certifies sustainability best practices, including and beyond regulatory compliance. This includes an active sustainability management system, air emissions assessments, air quality evaluations and continuous improvement projects.

SAFETY

SDS (SAFETY DATA SHEET)

LLDPE /LDPE film, the classification of material produced by Farnell Packaging Limited, is not a controlled substance and therefore does not require an SDS (Safety Data Sheet).

CUSTOMS & LOGISTICS

C-TPAT (CUSTOMS TRADE PARTNERSHIP AGAINST TERRORISM)

Farnell Packaging Limited is certified, compliant, and participates in the C-TPAT program. C-TPAT now offers an online monitoring system for certified participants in lieu of a certification number.

FILM STORAGE

Film must be stored in a dry and clean place at ambient temperature.

COUNTRY OF ORIGIN

Flexible Packaging and Polyethylene Films manufactured by Farnell Packaging Limited are produced at 26 and 30 Ilsley Avenue, Dartmouth, Nova Scotia, Canada, B3B 1L3. Farnell will approve vendors for materials supplied from outside suppliers.

DISCLAIMER

It is your responsibility to determine that our product is safe, lawful and technically suitable for your intended uses. Please note that this fact sheet is provided to you as a means to assist you in analyzing our product.

As product end use is not always disclosed, we suggest end user perform relevant testing/compliance requirements on their finished products to fulfill applicable regulatory conditions and obligations.

August 31, 2023