



Henkel Adhesive Technologies

WHITE PAPER

HENKEL'S **FOOD CONTACT** ***STATEMENT***

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Europe-specific
content



Valuable Information for Our Customers

As a producer of packaging adhesives, Henkel is part of the supply chain for food contact materials. In line with the European food contact legislation, we are obliged to perform a risk assessment for our food packaging products.

As there is no specific measure valid for adhesives on the European level, we are not bound to prepare declarations of compliance (DoC) but we have to give "adequate information" to our customers in order to allow the next stage of the supply chain to carry out its own risk assessment (see Union Guidance on Regulation (EU) No.10/2011 as regards information in the supply chain 2013, updated in 2016). Our food contact statements do not disclose our formulations but they are the result of the risk assessment at our stage of the supply chain. Following the recommendation of our adhesive association (FEICA, Fédération Européenne des Industries de Colles et Adhésifs), which published a guidance for a food contact status declaration for adhesives in March 2022 and the Union Guidance on Regulation (EU) 10/2011 as regards information in the supply chain, our documents have a well defined structure. They refer to the main European legislations valid for our adhesives.

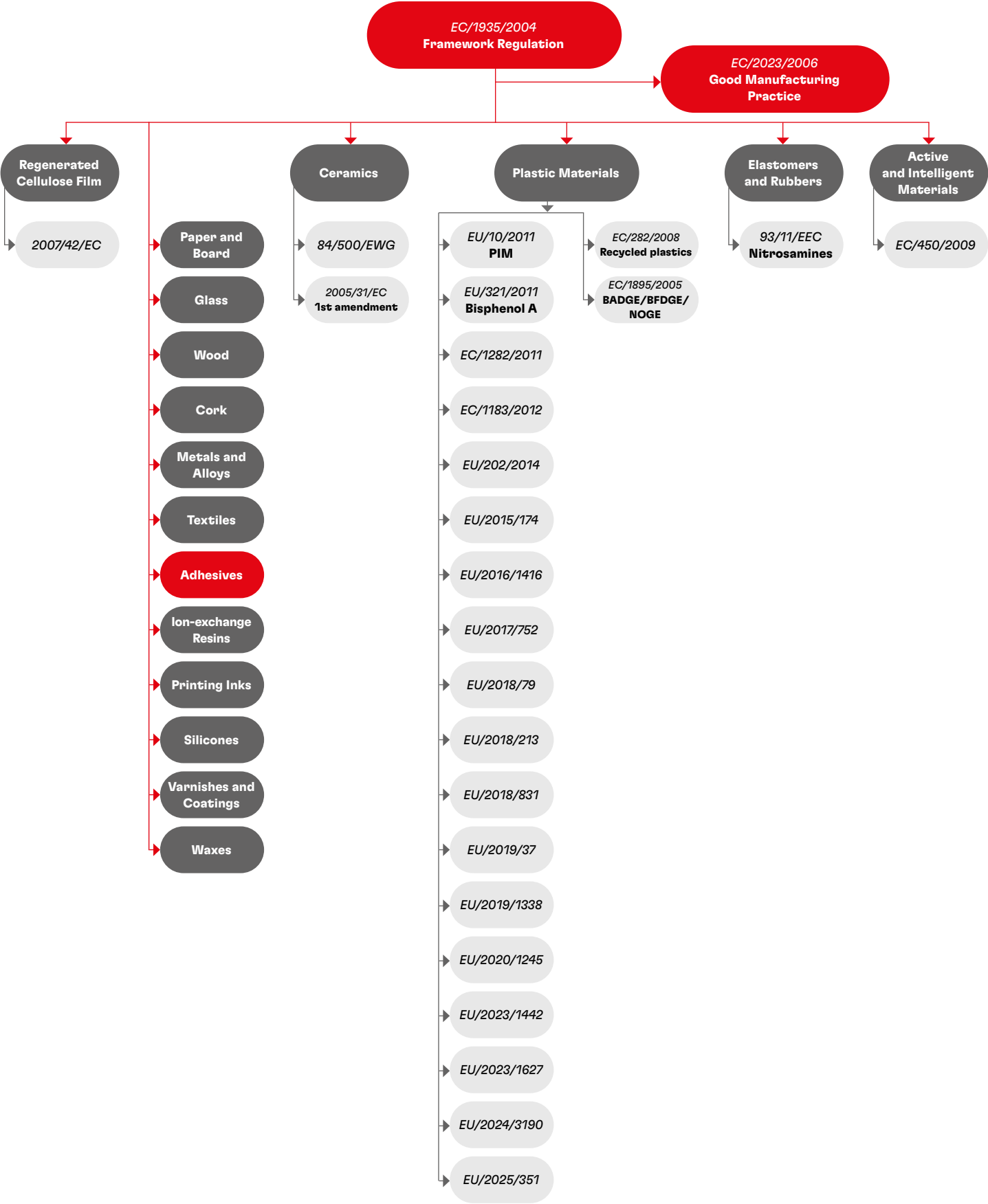
These are the **Framework Regulation (EC) No.1935/2004 and the Regulation on Good Manufacturing Practice (EC) No.2023/2006**. As there is no consistent legislation for adhesives in food contact, we base our risk assessment on the regulation (EU) No.10/2011, which contains a large positive list of substances evaluated for food contact (known as the Union list). According to article 2, paragraph 2, this regulation specifically is not valid for adhesives, but only applies to the plastic layers in multi-material multi-layers. It therefore does not regulate monomers and other components specially used only for adhesives.

However, according to our understanding, we can convey the specific restrictions for individual substances in the Plastics Regulation to our adhesives, because they are based on toxicological studies, and therefore it does not make a difference from which part of the packaging a substance migrates into food, either from the adhesive or from the plastic. In the end, the total amount of the restricted substance in the foodstuff is significant. **For all the substances which are not listed** in annex I of the Plastics Regulation, **we look for an evaluation in other European legislations**, e.g. in EFSA (European Food Safety Authority) opinions or in **national provisions** such as BfR Recommendations or Warenwet. **The most important part of our food contact statements** is a table with all specifically restricted substances, known as an **SML table (Specific Migration Limit)**. In this table, all migratable substances which

Henkel cannot control on its production stage are listed, as well as substances considered as "dual use" additives. For all these substances, we have to delegate the compliance check to the next stage of the supply chain. In our food contact statements, we do not name polymer-bonded monomers, substances without a specific restriction i.e. which are covered by the compliance with the overall migration and do not require any additional monitoring, as well as substances for which we can finish the compliance check during our stage of the production process. These substances are part of our company know-how, which we do not disclose in our statements.

In addition to the list of specifically controlled substances, in our statements **we inform our customers about possible application limits of our products**, about test methods for critical substances such as primary aromatic amines, and we let them know at which point their responsibility begins. Migration test results are also communicated, as well as the results from worst-case calculations and our own toxicological assessments. An important topic for the evaluation of a material for food contact suitability are the NIAS (Non-Intentionally Added Substances). These substances are either impurities of raw materials, reaction products, decomposition products or by-products. There is no material without NIAS. As they might be transferred into food, they also need to be risk assessed. Therefore, the statements for our adhesives that we recommend for food contact contain a detailed chapter on the topic NIAS. In this way, our customers are able to use all this additional information for their compliance work. With our very detailed food contact statements, we provide sufficient information to the producer of the final packaging to carry out their own risk assessment. Our food contact statements serve to avoid or reduce time-consuming and expensive tests for the evaluation of the final product.

Regulatory Requirements: European Legislation for Food Contact Materials



Key take aways

- Due to the absence of specific measures for adhesives, Henkel is not bound to prepare declarations of compliance (DoC), but has to provide customers with adequate information.
- Henkel's food contact statements refer to the main European legislation valid for food contact adhesives, i.e. Framework Regulation (EC) No.1935/2004 and the Regulation on Good Manufacturing Practice (EC) No.2023/2006 and include the result of the risk assessment at our stage of the supply chain.
- The most important part of a food contact statement is a table listing all specifically restricted substances, known as an SML table.
- Customers are informed about test methods for critical substances and at which point their responsibility begins.
- Results of migration tests, worst-case calculations and our own toxicological assessments are communicated.
- A chapter about possible NIAS and their risk assessment completes the detailed food contact statement.



About Henkel

With its brands, innovations and technologies, Henkel holds leading market positions worldwide in the industrial and consumer businesses. The business unit Adhesive Technologies is the global leader in the market for adhesives, sealants and functional coatings. With Consumer Brands, the company holds leading positions especially in laundry & home care and hair in many markets and categories around the world. The company's three strongest brands are Loctite, Persil and Schwarzkopf. In fiscal 2024, Henkel reported sales of more than 21.6 billion euros and adjusted operating profit of around 3.1 billion euros. Henkel's preferred shares are listed in the German stock index DAX. Sustainability has a long tradition at Henkel, and the company has a clear sustainability strategy with specific targets. Henkel was founded in 1876 and today employs a diverse team of about 47,000 people worldwide – united by a strong corporate culture, shared values and a common purpose: "Pioneers at heart for the good of generations." More information at www.henkel.com.



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Dr. Monika Tönnießen is a chemist by profession and works in the Product Safety department within the Adhesive Technologies business unit at Henkel. Since 2006, she has been handling customer inquiries as an expert on all food contact-related questions. She is a member of the paper and packaging group of the European Adhesive Association (FEICA).

Thank you.

Contact

An expert team at Henkel is always available to answer your questions.

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