



DONECK EUROFLEX
FLEXOGRAPHIC INKS FOR EUROPE

Doneck Euroflex S.A. · 4, an de Längten · L-6776 Grevenmacher

Harmanec-Kuvert, spol. s.r.o.
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DECLARATION REGARDING
REACH – SVHC – PFAS – POP
No. 12517-23

Annex XIV (Authorisation List) and Annex XVII (Restriction List) of REACH Regulation

The water-based printing inks and varnishes of the series EURO-FLASH, EURO-BASE, EURO-BOARD, EURO-PRINT, EURO-FOOD, EURO-MAIL, EURO-SPARK as well as the overprint lacquers of the series EURO-LAC delivered to Harmanec-Kuvert, spol. s.r.o. and listed below, are in compliance with the legal restrictions on the use and the limits of the Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

article No	article designation	series
WBF1165	Gold for BAG	EURO-FLASH
WBF1173	PMS 874 U - Gold for bag	EURO-FLASH
WEA1098	BASE Yellow (BAG)	EURO-BASE
WEA2081	GF 04 - Rot-bläulich	EURO-BASE
WEA2379	BASE Red (BAG)	EURO-BASE
WEA2380	BASE Magenta (BAG)	EURO-BASE
WEA2705	BASE Pink (BAG)/MIRAFLEX	EURO-BASE
WEA3211	BASE Cyan (BAG)	EURO-BASE
WEA3716	Base Violet (BAG)/MIRAFLEX	EURO-BASE
WEA4100	BASE Green (BAG)	EURO-BASE
WEA6086	BASE White (BAG)	EURO-BASE
WEA8142	BASE Black (BAG)/MIRAFLEX	EURO-BASE
WEC1132	GF 01 - Gelb/OBALKY	EURO-BASE
WEC2157	GF 03 - Rot-gelblich/OBALKY	EURO-BASE
WEC3057	GF 06 - Blau-grünlich/OBALKY	EURO-BASE
WEC3555	GF 08 - Violett/OBALKY	EURO-BASE
WEC4077	GF 09 - Grün	EURO-BASE
WEC8105	GF 10 - Schwarz/OBALKY	EURO-BASE
WKA620007	White "C"	EURO-BOARD
WKA650100	White "D"	EURO-BOARD
WKA8361	Black for test	EURO-BOARD
WKA9498	Rub-resistant improver	EURO-BOARD
WPA1644	Orange 021	EURO-PRINT
WPA9176	Technical Varnish for paper bags/MIRAFLE	EURO-PRINT
WSO1051	Process Yellow (food)	EURO-FOOD
WSO2108	Process Magenta (food)	EURO-FOOD



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article No	article designation	series
WSO3060	Process Blue (food)	EURO-FOOD
WSO6037	White (food)	EURO-FOOD
WSO8026	Process Black (food)	EURO-FOOD
WUA1024	Glanzlack/MIRAFLEX	EURO-LAC
WXA9029	LC Technischer Verschnitt/OBALKY	EURO-MAIL
WXA9200	Aufhellungsverschnitt/OBALKY	EURO-MAIL
WZA1086	PMS 877 Silver NEW	EURO-SPARK

EuPIA Exclusion Policy

The above-mentioned products are formulated and manufactured in accordance with the EuPIA Exclusion Policy for Printing Inks and Related Products (state March 2021). This list specifies toxic substances, pigments, dye colorants, solvent, plasticisers, and other additives, as well as substances and mixtures classified according to CLP Regulation (EC) No 1272/2008 as:

- carcinogenic, germ cell mutagenic and toxic for reproduction (CMR) Category 1A and 1B
- acute toxic Category 1 and 2 (as well as Category 3 for inhalation toxicity)
- specific target organ toxicity (STOT) single exposure Category 1

EuPIA members do not use substances classified as carcinogenic, mutagenic, or toxic for reproduction cat. 1A or 1B according to Regulation (EC) No 1272/2008 in the manufacture of inks and related products. All these are excluded from use in printing inks by the EuPIA Exclusion Policy.

For particular technical and performance reasons, EuPIA members might use substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR) cat. 2 in the manufacture of certain specific inks and related products when these are below the relevant concentration limits for classification, as per Annex I, part 3 of the Regulation (EC) No 1272/2008. Please consider that the titanium dioxide as standard pigment for white colors is classified as carcinogenic cat. 2! However, its classification only applies to inhalable powders and not for liquid inks or dried ink films, where titanium dioxide is completely embedded in the polymer matrix.

REACH-registration

Doneck Euroflex is actively pursuing the REACH legislative procedures. As a downstream user, Doneck Euroflex is also a customer of other downstream users and is therefore not directly involved in the actual registration process.

The registration numbers of substances, which meet the criteria for classification as hazardous and which are contained above the limits according to CLP, are listed in section 3 of the safety data sheets, or are excluded from the regulation, and/or exempted from registration, and/or polymers.

We are in close contact with various industry associations regarding the future classification of substances under REACH in order to know the potential consequences for our production processes. If we receive further information regarding REACH, which will influence our products, we will promptly inform our customers of the relevant details and any corresponding product changes.



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Our suppliers have confirmed the registration of substances that are covered by the latest REACH registration deadline (2018). Due to the dynamic changes in the above regulations, Doneck Euroflex is working closely with its suppliers to ensure that the relevant raw materials concerned by REACH are taken into account, thus ensuring that our production processes are not impeded.

SVHC substances and CMR, PBT, vPvB according to article 59

See attached customer information on the current candidate list of the European Chemical Agency (ECHA) about substances of very high concern (SVHC), which now contains 233 substances in total, last update on 17th January 2023.

Article 59 of REACH Regulation (EU) No 1907/2006 regulates substances of very high concern (SVHC), which to be include in Annex XIV of this Regulation: CMR, PBT and vPvB substances in accordance with the criteria of article 57 of REACH Regulation (EU) No 1907/2006, which are

- meeting the criteria for classification CMR 1A or 1B
- meeting the criteria for classification PBT (persistent, bioaccumulative and toxic)
- meeting the criteria for classification vPvB (very persistent and very bioaccumulative)

At this stage of knowledge our formulations of the printing inks, varnishes and lacquers, delivered to to Rotolux NV, do not contain any substances with the criteria for very high concern substances (SVHC) at a concentration above 0.1% (w/w).

SCIP Database

SCIP is the database of information on substances of concern in articles ("products") established under the Waste Framework Directive 2008/98/EC (Substances of Concern in articles as such or in complex objects (products)).

Companies supplying articles containing substances of very high concern (SVHC) on the candidate list in concentrations above 0.1% weight/weight (w/w) to the EU market must submit information on these articles to ECHA from 5 January 2021.

REACH defines an article: *means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition (Art. 3.3).*

Printing ink is not an article, but a mixture. Therefore, it is not the manufacturers of printing inks, but the suppliers concerned by the notification in the SCIP database.

Regulation (EC) on persistent organic pollutants (POPs)

We confirm that the above-mentioned products do not constitutionally contain any persistent organic pollutants listed in Regulation (EC) 850/2004, as amended by Regulation (EU) 2019/1021.



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Per- and polyfluorinated substances and persistent organic pollutants (POPs)

Furthermore, we can confirm that in the formulation of the above-mentioned products the following substances are not intentionally added:

- perfluoroalkyl substances (PFAS) in form of perfluorosulfonic acids (PFSA, perfluoroalkylsulfonates) like perfluorooctansulfonic acids (perfluorooctansulfonates - PFOS), perfluorocarboxylic acids (PFCA) like perfluorooctanoic acids (PFOA), its salts and precursor substances according to the Regulation (EU) 2017/1000¹ as well as fluorotelomer alcohols (FTOH), including polytetrafluoroethylene (PTFE, e.g. trade name Teflon). PTFE is not intentionally added to the formulations of the above-mentioned products.
- persistent organic pollutants, e. g. PFOA, its salts and/or PFOA-related compounds and Perfluorooctane sulfonic acid and its derivatives (PFOS) in compliance with Regulation (EU) 2019/1021² and Delegation Regulation (EU) 2020/784³.

This document superseded previous statements on this subject.

The estimation is based on information from our suppliers and our information on our products. Therefore, we have no reason to assume that these substances would be contained in our product in regulatory or toxicologically significant amounts, thus we do not specifically analyse our finished product for the presence of these substances.

However, we cannot exclude trace amounts in the end-product which are not intentionally added but can originate from impurities in raw materials or from reaction or degradation products of the manufacturing and drying process or detected ubiquitously in the environment. The identification and quantification of such non-intentionally added substances is analytically very difficult or even impossible.

Grevenmacher, 22nd March 2023
DONECK EUROFLEX S.A.

Irina Becker
Technical Safety Service

¹ **COMMISSION REGULATION (EU) 2017/1000** of 13 June 2017 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards perfluorooctanoic acid (PFOA), its salts and PFOA-related substances.

² **Regulation (EU) 2019/1021** of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants

³ **Commission Delegated Regulation (EU) 2020/784** of 8 April 2020 amending Annex I to Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards the listing of perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds

EcoVantage Kraft Classic



Benefits

- Top ply made of fresh fibre for natural appearance and attractive branding
- Bottom ply made of recycled fibre
- Contains a minimum 50% recycled content
- Balanced fibre content for optimal performance and recyclability
- Good strength and excellent printability

End-uses

- Dry food packaging
- Grocery bags for supermarkets
- Home fashion
- Food delivery



PEFC	FSC*	BRCGS	Quality Management System	Environmental Management System	Safety Management System
•	•	•	ISO 9001:2016	ISO 14001:2016	OHSAS 18001:2008

*on demand

Technical Values									
Properties		Method	Typical values						
Basis Weight	g/m ²		70	80	90	100	110	115	120
Burst strength	kPa	ISO 2758	270	350	350	362	378	381	391
Tensile strength MD	kN/m	ISO 1924-3	6,7	8	8	8,4	8,8	8,9	9,1
Tensile strength CD	kN/m	ISO 1924-3	2,8	3,2	3,6	3,9	4,1	4,1	4,2
TEA MD	J/m ²	ISO 1924-3	63	72	74	82	90	94	98
TEA CD	J/m ²	ISO 1924-3	98	112	98	109	120	125	131
Tear strength MD	mN	ISO 1974	560	680	765	850	935	978	1020
Tear strength CD	mN	ISO 1974	700	840	945	1050	1155	1208	1260
Gurley	s	ISO 5636-5	50						
Cobb ₆₀	g/m ²	ISO 535	30						
Moisture	%	ISO 287	7,8						



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Test conditions:
ISO 554 - 1976
(23 C + 1 C/RH 50% +2)