

RAPPORTO DI PROVA / TEST REPORT

NUMBER

1860\FPM\FDC\21_3

ISSUE DATE

23/11/2021

BUSINESS AREA

BA Product Conformity Assessment

LABORATORY

Food Contact

SPECIMEN DESCRIPTION

Varnish code 1400/0110 Blue Ral 5015
Varnish code 1400/0409 Blue Ral 5013

CUSTOMER

PULVERIT SPA
VIA CARLO REALE, 15/4
20157 MILANO (MI)

REFERENCE STANDARD

D.P.R. 777 dated 23/08/1982, D.L. 108 dated 25/01/1992, D.M.34 dated 21/3/73
Regulation 1935/2004/EC GUCE L 338 dated 13/11/04
Regulation 10/2011/EU, GUUE L 12 dated 15/01/2011, and subsequent updates.
DM 174/2004 - D.Lgs n. 31/2001 Directive 2015/1787/UE

GENERALITIES

- Sample receiving date: 23/09/2021
- Analysis start date: 05/10/2021
- Analysis end date: 10/11/2021
- Laboratory site: Viale Lombardia, 20/B – 20021 Bollate (MI)
- Test site: Viale Lombardia, 20/B – 20021 Bollate (MI)
- Deviation from test methods: NO

SAMPLE DESCRIPTION

Varnish code 1400/0110 Blue Ral 5015
 Varnish code 1400/0409 Blue Ral 5013

SAMPLING

The sampling for the test has been done drawing casually part of the sample in our possession. Sampling was carried out according to the following procedures.

Subject that performed the sampling

Sampling report

Notified Body

TAB

CSI-CERT

Customer

Other

Reference number

Date of issue

Reference number

Date of issue

Reference number

Date of issue

Reference number

n.a.

Date of issue

n.a.

Reference number

Date of issue

DECLARATION

The test results of the present report are related exclusively to the tested sample, as received. The data relating to the sample are provided by the customer and not verified by the laboratory, unless expressly indicated. The laboratory declines all responsibility. The present test report cannot be partially reproduced without the authorization of CSI managing Director. The uncertainties are estimated as extended uncertainty obtained multiplying the standard uncertainty by the coverage factor k corresponding to a confidence level of about 95%. Normally, this factor = 2. (*)Not under ACCREDIA accreditation.

This is an English translation of report 1860\FPM\FDC\21_1 dated 12/11/2021

PERFORMED DETERMINATIONS

1) DETERMINATION OF THE OVERALL MIGRATION

UNI EN 1186-1:2003 + UNI EN 1186-3:2003

D.P.R. 777 dated 23/08/1982, D.L. 108 dated 25/01/1992, D.M. 174/2004

Simulant	Contact condition
Distilled water	24 hours at 40°C

Migration test was carried out by **total immersion**.

SURFACE (dm²): 5

VOLUME (dl): 5

LOD (limit of detection): 5 mg/kg.

2) DETERMINATION OF THE COLOURING MIGRATION

MI_789200557_2015_Rev.0

Determination of migration of the coloring agents from the tested material into the simulants by spectrophotometric analysis in the spectral range 400 - 750 nm; 10 cm optical path cell for the aqueous simulant and 1 cm for the fatty simulant.

Limit minimum 95% transmittance (T%).

3) SPECIFIC MIGRATION OF PRIMARY AROMATIC AMINES

MI_05_2014_FPM_FDC_Rev.2

Determination of the specific migration of primary aromatic amines performed in food simulants using LC-MS / MS. The quantification is performed by an external calibration in the same simulant.

SML: 0.002 mg/kg food

LoQ: 0.0004 mg/kg

4) SPECIFIC MIGRATION INTO SIMULANTS OF BA, CO, MN, ZN, CU, FE, LI, AL, NI, HG, CR, AS, PB, CD, SB (*)*MI_789800065_2020_rev0*

Determination of the specific migration of Ba, Co, Mn, Zn, Cu, Fe, Li, Al, Ni, Cd, Hg, Cr, As, Pb according to Reg. UE 10/2011 from the tested material into the simulants by ICP (Inductively Coupled Plasma) technique. The quantitative evaluation was carried out by external calibration of the elements in the same liquid simulants.

Ba - SML: 1 mg/kg; LOD: 0.02 mg/kg

Co - SML: 0.05 mg/kg; LOD: 0.02 mg/kg

Mn - SML: 0.6 mg/kg; LOD: 0.02 mg/kg

Li - SML: 0.6 mg/kg; LOD: 0.02 mg/kg

Zn - SML: 5 mg/kg; LOD: 1 mg/kg

Cu - SML: 5 mg/kg; LOD: 1 mg/kg

Fe - SML: 48 mg/kg; LOD: 1 mg/kg

Al - SML: 1 mg/kg; LOD: 0.5 mg/kg

Ni - SML: 0.02 mg/kg; LOD: 0.01 mg/kg

Specific migration of Hg, Cr, Pb, As, Cd, Sb according to Reg. (UE) 1245/2020, dated 2020 September 02nd.

Hg-SML: ND (0.01 mg/kg); LOD: 0.01 mg/kg

Cr-SML: ND (0.01 mg/kg); LOD: 0.01 mg/kg

Pb-SML: ND (0.01 mg/kg); LOD: 0.01 mg/kg

As-SML: ND (0.01 mg/kg); LOD: 0.01 mg/kg

Cd-SML: ND (0.002 mg/kg); LOD: 0.002 mg/kg

Sb - SML: 0.04 mg/kg; LOD: 0.02 mg/kg

5) SPECIFIC MIGRATION INTO SIMULANTS OF LA, EU, GD, TB (*)*MI_789800066_2020_Rev0*

Determination of the specific migration of La, Eu, Gd, Tb according to Reg. (UE) 1245/2020, dated 2020 September 02nd. from the tested material into the simulants by ICP (Inductively Coupled Plasma) technique. The quantitative evaluation was carried out by external calibration of the elements in the same liquid simulants.

La, Eu, Gd, Tb - SML: 0.05 mg/kg expressed as the sum of the metals; LOD: 0.01 mg/kg

6) SPECIFIC MIGRATIONS OF METALS (*)*MI_789200410_2015_Rev.0*

Determination of the specific migration of metals performed ICP-MS (Inductively Coupled Plasma - Mass Spectrometry) technique with Agilent 7900 instrument.

7) SPECIFIC MIGRATION OF BISPHENOL A DIGLYCIDYL ETHER (BADGE) (*)*MI_789200684_2015_Rev.0*

Determination of the specific migration of Bisphenol A Diglycidyl Ether- BADGE- in the simulants through HPLC analysis.

The quantification is carried out by external calibration of BADGE in the same liquid simulants.

Analysis LC-MS

SML BADGE: 1 mg/kg - LOQ: 0.5 mg/kg

8) SPECIFIC MIGRATION OF BISPHENOL A (CAS 80-05-7)*MI_06_FPM_FDC Rev.12_2020*

Determination of specific migration of Bisphenol A (cas 000080-05-7) in liquid simulant with analyse with LCMSMS. The quantitative evaluation was carried out by external calibration of Bisphenol A in the same liquid simulant.

SML: 0.05 mg/kg

LoQ: 0.01 mg/kg

9) DETERMINATION OF THE CONTENT OF BFDGE E NOGE (*)*MI_789200357_2015_Rev.0*

Determination of the content of BFDGE e NOGE with analysis by LC-MS-FLD. The quantitative evaluation was carried out by external calibration of BFDGE e NOGE in the same matrix.

LOD in analysis: 0.01 mg/kg

10) DETERMINATION OF THE CONTENT OF EPICHLOROHYDRIN (*)*MI_789200184_2015_Rev.0*

Determination of the content of epichlorohydrin (CAS 106-89-8) carried out by HS/GC-MS.

QM : 1 mg/kg in the FP

LOD : 0.5 mg/kg

11) SPECIFIC MIGRATION OF N-BUTYL ACRYLATE (CAS 000141-32-2) (*)*MI_789200662_2015_Rev.0*

SPECIFIC MIGRATION OF N-BUTYL ACRYLATE

Determination of the specific migration of n-butyl acrylate (CAS 000141-32-2 e N. Rif 10780 from the tested material into the simulant by Head Space/Gas Chromatography/Mass Spectrometer analysis. The quantitative evaluation is carried out by external calibration of n-butyl acrylate in the same liquid simulant.

SML(T): 6 mg/kg.

LOD: 1 mg/kg.

12) SPECIFIC MIGRATION OF 2-ETHYLHEXYL ACRYLATE (CAS 0000103-11-7 AND N. RIF 11500) (*)*MI_789300857_2015_Rev.0*

Determination of specific migration of 2-Ethylhexyl acrylate (CAS 0000103-11-7 and N. Rif 11500) in liquid simulant with HS/GC-MS technique.

SML: 0.05 mg/kg

LOD: 0.05 mg/kg

**13) TASTE ORGANOLEPTIC TEST ACCORDINGLY TO REGULATION (EC) 1935/2004 FOLLOWING UNI
10192:2000 (*)**

UNI 10192

The taste scoring test is a evaluation of the taste, measured with a 5 point scale. Each judge is asked to taste samples of water coming from the contacts with the specimens. They are then asked to give a mark to each water sample they taste, according to the following scale:

- 0: no perceivable difference in taste
- 1: difference just perceivable, very difficult to define
- 2: weak difference but identifiable taste
- 3: strong difference in taste
- 4: very strong difference in taste

The final result is expressed with the average value of the scores given by each judge, coupled with the standard deviation.

Testing conditions:

storage time : 18 hours
storage temperature : 55 ± 1 °C
quantity of sample: 1,5 dm²
food stimulant: natural water Levissima
members of panel : 6

The sample is recognized to have a potential organoleptic impact on the product if the average score plus one time the standard deviation is higher than or equal to 3.

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RESULTS
1) DETERMINATION OF THE OVERALL MIGRATION

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	Limit Value (According to DM 21/3/73)
<5	<5	--	60 ± 12
<5			
<5			

Varnish code 1400/0110 Blue Ral 5013			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	Limit Value (According to DM 21/3/73)
7.8	8.1	1.6	60 ± 12
8.2			
8.2			

1) DETERMINATION OF THE COLOURING MIGRATION

Varnish code 1400/0110 Blue Ral 5015		
Food simulant: Distilled water		
Contact condition: 24 hours at 40°C		
Optical path: 10 cm		
Measured unit: T%		
measured value	Extended uncertainty ⁽¹⁾	limit value (according to DM 21/03/73)
96.3	0.5	≥95

Varnish code 1400/0110 Blue Ral 5013		
Food simulant: Distilled water		
Contact condition: 24 hours at 40°C		
Optical path: 10 cm		
Measured unit: T%		
measured value	Extended uncertainty ⁽¹⁾	limit value (according to DM 21/03/73)
99.8	0.5	≥95

 (1) for this variable the third paragraph of **DECLARATIONS** is not applicable

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2) SPECIFIC MIGRATION OF PRIMARY AROMATIC AMINES

Varnish code 1400/0110 Blue Ral 5015		
Food simulant: Distilled water		
Contact condition: 24 hours at 40°C		
COMPOUND	mg/kg	SML(mg/kg) (Reg.EU 10/2011)
2,4,5-Trimethylaniline (2,4,5 TMA CAS 137-17-7)	< 0.0004	0.002
2-Methoxy-5-methylaniline (2-M-5-MA CAS 120-71-8)	< 0.0004	0.002
2-Naphthylamine (2-ANP CAS 91-59-8)	< 0.0004	0.002
3,3'-Dimethylbenzidine (3,3 DMB CAS 119-93-7)	< 0.0004	0.002
4,4'-Diaminodiphenylether (4,4-DPE CAS 101-80-4)	< 0.0004	0.002
4,4'-Methylenebis[2-chloroaniline] (CL-MDA CAS 101-14-4)	< 0.0004	0.002
4,4'-Methylenedianiline (4,4 MDA CAS 101-77-9)	< 0.0004	0.002
4,4'-Methylenedi-o-toluidine (4,4 MDOT CAS 838-88-0)	< 0.0004	0.002
4,4'Thioaniline (4,4-thioANL CAS 139-65-1)	< 0.0004	0.002
4-Aminobiphenyl (4-ABP CAS 92-67-1)	< 0.0004	0.002
4-chloro-Aniline (4-CA CAS 106-47-8)	< 0.0004	0.002
4-Chloro-o-toluidine (4-CoT CAS 95-69-2)	< 0.0004	0.002
5-Nitro-o-Toluidine (5-N-oT CAS 99-55-8)	< 0.0004	0.002
Benzidine (BNZ CAS 92-87-5)	< 0.0004	0.002
o-Anisidine (o-ASD CAS 90-04-0)	< 0.0004	0.002
o-Dianisidine (o-diASD CAS 119-90-4)	< 0.0004	0.002
o-Toluidine (o-TOL CAS 95-53-4)	< 0.0004	0.002
p-Aminoazobenzene (AAB CAS 60-09-3)	< 0.0004	0.002
2,4/2,6-Toluenediamine (2,4-2,6-TDA CAS 823-40-5 CAS 95-80-7)	< 0.0008	0.002
o-Aminoazotoluene (CAS 97-56-3)	< 0.0004	0.002
4-methoxybenzene-1,3-diamine (CAS 615-05-4)	< 0.0004	0.002
3,3-Dichlorobenzidine (CAS 91-94-1)	< 0.0004	0.002

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Varnish code 1400/0110 Blue Ral 5013		
Food simulant: Distilled water		
Contact condition: 24 hours at 40°C		
COMPOUND	mg/kg	SML(mg/kg) (Reg.EU 10/2011)
2,4,5-Trimethylaniline (2,4,5 TMA CAS 137-17-7)	< 0.0004	0.002
2-Methoxy-5-methylaniline (2-M-5-MA CAS 120-71-8)	< 0.0004	0.002
2-Naphthylamine (2-ANP CAS 91-59-8)	< 0.0004	0.002
3,3'-Dimethylbenzidine (3,3 DMB CAS 119-93-7)	< 0.0004	0.002
4,4'-Diaminodiphenylether (4,4-DPE CAS 101-80-4)	< 0.0004	0.002
4,4'-Methylenebis[2-chloroaniline] (CL-MDA CAS 101-14-4)	< 0.0004	0.002
4,4'-Methylenedianiline (4,4 MDA CAS 101-77-9)	< 0.0004	0.002
4,4'-Methylenedi-o-toluidine (4,4 MDOT CAS 838-88-0)	< 0.0004	0.002
4,4'Thioaniline (4,4-thioANL CAS 139-65-1)	< 0.0004	0.002
4-Aminobiphenyl (4-ABP CAS 92-67-1)	< 0.0004	0.002
4-chloro-Aniline (4-CA CAS 106-47-8)	< 0.0004	0.002
4-Chloro-o-toluidine (4-CoT CAS 95-69-2)	< 0.0004	0.002
5-Nitro-o-Toluidine (5-N-oT CAS 99-55-8)	< 0.0004	0.002
Benzidine (BNZ CAS 92-87-5)	< 0.0004	0.002
o-Anisidine (o-ASD CAS 90-04-0)	< 0.0004	0.002
o-Dianisidine (o-diASD CAS 119-90-4)	< 0.0004	0.002
o-Toluidine (o-TOL CAS 95-53-4)	< 0.0004	0.002
p-Aminoazobenzene (AAB CAS 60-09-3)	< 0.0004	0.002
2,4/2,6-Toluenediamine (2.4-2,6-TDA CAS 823-40-5 CAS 95-80-7)	< 0.0008	0.002
o-Aminoazotoluene (CAS 97-56-3)	< 0.0004	0.002
4-methoxybenzene-1,3-diamine (CAS 615-05-4)	< 0.0004	0.002
3,3-Dichlorobenzidine (CAS 91-94-1)	< 0.0004	0.002

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- 3) SPECIFIC MIGRATION INTO SIMULANTS OF BA, CO, MN, ZN, CU, FE, LI, AL, NI, HG, CR, AS, PB, CD, SB (*)
 4) SPECIFIC MIGRATION INTO SIMULANTS OF LA, EU, GD, TB (*)

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Metals	Average value	Extended uncertainty	Limit value (secondo Reg. UE 10/2011)
Ba	< 0.02	-	1
Co	< 0.02	-	0.05
Mn	< 0.02	-	0.6
Zn	< 1	-	5
Cu	< 1	-	5
Fe	< 1	-	48
Li	< 0.02	-	0.6
Al	< 0.5	-	1
Ni	< 0.01	-	0.02
Sb	< 0.02	-	0.04 ²
Hg	< 0.01	-	ND (LR 0.01) ²
As	< 0.01	-	ND (LR 0.01) ²
Cr	< 0.01	-	ND (LR 0.01) ²
Pb	< 0.01	-	ND (LR 0.01) ²
Cd	< 0.002	-	ND (LR 0.002) ²
La	< 0.01	-	0.05 expressed as the sum ²
Eu	< 0.01	-	
Gd	< 0.01	-	
Tb	< 0.01	-	

2 according to Reg. (UE) 1245/2020, dated 2020 September 02nd, the specific migration limits will entry in force from 23 September 2022.

Varnish code 1400/0110 Blue Ral 5013			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Metals	Average value	Extended uncertainty	Limit value (secondo Reg. UE 10/2011)
Ba	< 0.02	-	1
Co	< 0.02	-	0.05
Mn	< 0.02	-	0.6
Zn	< 1	-	5
Cu	< 1	-	5
Fe	< 1	-	48
Li	< 0.02	-	0.6
Al	< 0.5	-	1
Ni	< 0.01	-	0.02

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Sb	< 0.02	-	0.04 ²
Hg	< 0.01	-	ND (LR 0.01) ²
As	< 0.01	-	ND (LR 0.01) ²
Cr	< 0.01	-	ND (LR 0.01) ²
Pb	< 0.01	-	ND (LR 0.01) ²
Cd	< 0.002	-	ND (LR 0.002) ²
La	< 0.01	-	0.05 expressed as the sum ²
Eu	< 0.01	-	
Gd	< 0.01	-	
Tb	< 0.01	-	

² according to Reg. (UE) 1245/2020, dated 2020 September 02nd, the specific migration limits will entry in force from 23 September 2022.

5) SPECIFIC MIGRATIONS OF METALS (*)

Varnish code 1400/0110 Blue Ral 5015		
Simulant: Distilled water		
Contact condition 24 hours at 40°C		
Metals	Measured value ± Extended uncertainty	Limit value (according D.Lgs n. 31/2001 - Directive 2015/1787/UE)
Cd	< 0.5 µg/l	5 µg/l
Pb	< 1 µg/l	10 µg/l
Ni	< 2 µg/l	20 µg/l
Cr	< 5 µg/l	50 µg/l
Sb	0.6 ± 0.3 µg/l	5 µg/l
As	< 1 µg/l	10 µg/l
Cu	< 0.1 mg/l	1 mg/l
B	< 0.1 mg/l	1 mg/l
V	< 5 µg/l	50 µg/l
Hg	< 0.2 µg/l	1 µg/l
Se	< 1 µg/l	10 µg/l
Na	< 20 mg/l	200 mg/l (1)

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Mn	< 5 µg/l	50 µg/l ⁽¹⁾
Fe	< 20 µg/l	200 µg/l ⁽¹⁾
Al	< 20 µg/l	200 µg/l ⁽¹⁾

(1) indicator parameter – D.Lgs. n. 31/2001, Annex I, Table C.

Varnish code 1400/0110 Blue Ral 5013		
Simulant: Distilled water		
Contact condition 24 hours at 40°C		
Metals	Measured value ± Extended uncertainty	Limit value (according D.Lgs n. 31/2001 - Directive 2015/1787/UE)
Cd	< 0.5 µg/l	5 µg/l
Pb	< 1 µg/l	10 µg/l
Ni	< 2 µg/l	20 µg/l
Cr	< 5 µg/l	50 µg/l
Sb	< 0.5 µg/l	5 µg/l
As	< 1 µg/l	10 µg/l
Cu	< 0.1 mg/l	1 mg/l
B	< 0.1 mg/l	1 mg/l
V	< 5 µg/l	50 µg/l
Hg	< 0.2 µg/l	1 µg/l
Se	< 1 µg/l	10 µg/l
Na	< 20 mg/l	200 mg/l ⁽¹⁾
Mn	< 5 µg/l	50 µg/l ⁽¹⁾
Fe	< 20 µg/l	200 µg/l ⁽¹⁾
Al	< 20 µg/l	200 µg/l ⁽¹⁾

(1) indicator parameter – D.Lgs. n. 31/2001, Annex I, Table C.

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6) SPECIFIC MIGRATION OF BISPHENOL A DIGLYCIDYL ETHER (BADGE) (*)

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	SML (According to Reg.EU 10/2011)
< 0.5	< 0.5	-	1
< 0.5			

7) SPECIFIC MIGRATION OF BISPHENOL A (CAS 80-05-7)

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	SML (According to Reg.EU 213/2018)
< 0.01	< 0.01	-	0.05
< 0.01			

8) DETERMINATION OF THE CONTENT OF BFDGE E NOGE (*)
BFDGE

Varnish code 1400/0110 Blue Ral 5015		
Measured unit: mg/kg		
Determined value	Average value	Extended uncertainty
< 0.1	< 0.1	--
< 0.1		

NOGE

Varnish code 1400/0110 Blue Ral 5015		
Measured unit: mg/kg		
Determined value	Average value	Extended uncertainty
< 0.1	< 0.1	--
< 0.1		

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9) DETERMINATION OF THE CONTENT OF EPICHLOROHYDRIN (*)

Varnish code 1400/0110 Blue Ral 5015			
Measured unit: mg/kg			
measured value	average value	Extended uncertainty	QM (according to Reg.EU 10/2011)
< 0.5	< 0.5	--	1
< 0.5			

10) SPECIFIC MIGRATION OF N-BUTYL ACRYLATE (CAS 000141-32-2) (*)

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	SML (According to Reg.EU 10/2011)
< 1	< 1	-	6
< 1			

11) SPECIFIC MIGRATION OF 2-ETHYLHEXYL ACRYLATE (CAS 0000103-11-7 AND N. RIF 11500) (*)

Varnish code 1400/0110 Blue Ral 5015			
Simulant: Distilled water			
Contact condition 24 hours at 40°C			
Measured unit: mg/kg			
Determined value	Average value	Extended uncertainty	SML (According to Reg.EU 10/2011)
< 0.05	< 0.05	-	0.05
< 0.05			

12) TASTE ORGANOLEPTIC TEST ACCORDINGLY TO REGULATION (EC) 1935/2004 FOLLOWING UNI 10192:2000 (*)

SAMPLE	MEDIAN VALUE	STANDARD DEVIATION
Varnish code 1400/0110 Blue Ral 5015	1.2	0.5

Opinions and interpretations - not object of ACCREDIA accreditation.

CONCLUSIONS

In the chosen test condition the samples

Varnish code 1400/0110 Blue Ral 5015

Varnish code 1400/0110 Blue Ral 5013

are suitable to be used in contact with wated intended for human consumption.

With reference to specific migrations, the compliance computations have been arranged assuming that 1 kg of food comes in contact with 6 dm² of material.

The sample tested by this Laboratory are therefore suitable to come in contact with foodstuff mentioned above on condition that they have been produced employing the monomers, additives and technical support agents according to in force legislation and specific migrations are respected.

**DATA
Date**

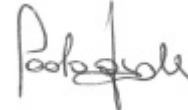
**Operating Sector Food Packaging
Materials**

BA Product Conformity Assessment

23/11/2021

Alberto Taffurelli

Ing. P. Fumagalli



The document is digitally signed in accordance with Legislative Decree n. 82/2005 as amended and replaces the paper document and the handwritten signature and it's valid from the date of affixing the digital signature.