



RAKOLL® GXL 3

Type of Product: PVA based dispersions of one-component adhesive

General Description of Product: These products are suitable for gluing of windows and doors, board joint and block gluing of softwood and hardwood (chopping boards, solid wood furniture, etc.).

Food Contact Regulation in Europe

Regulation (EU) No 1935/2004 on materials and articles intended to come into contact with food is valid for all material groups including the ones for which no specific Regulation has been established yet. The principle underlying this Regulation that any material or article intended to come into contact with food directly or indirectly must be sufficiently inert to preclude substances from being transferred to food in quantities large enough to endanger human health or to bring about an unacceptable change in the composition of the food or a deterioration of its organoleptic properties. As for the material group of adhesives no harmonized European Regulation has been implemented yet, National or European provisions can be used instead.

1. COMPLIANCE WITH EUROPEAN AND NATIONAL REGULATIONS

- a. Compliance with Regulation (EC) No 1935/2004 can be confirmed for the requirements of traceability and good manufacturing practice. The risk assessment of the adhesive regarding Article 3 of this Regulation was made by the received information in respect to the composition and compliance with the different provisions referenced below.
- b. The product is manufactured in compliance with the Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food, taking into account all applicable rules. This is based on the ISO 9001:2015 certification covering all EIMEA¹ H.B. Fuller production sites.
- c. Although adhesives are not part of the plastics material group, the Commission Regulation (EU) No 10/2011 is a suitable tool to verify if the adhesive components are in accordance with the comprehensive evaluated substance list. Especially for adhesives other legal approaches are used as well.
 - i. Concerning “Dual used additives” as defined in Commission Regulation (EU) No 10/2011, it is most unlikely that the threshold of an additive in the food is affected by the additives of the adhesive. We can confirm that we do not intentionally add any food additives or flavourings to the production process of the concerned product.

¹ Europe, Middle East, Africa and India



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- ii. All raw materials of the concerned H.B. Fuller product could be risk assessed using different regulations as Commission Regulation (EU) No 10/2011, Swiss Ordinance or certain BfR Recommendations (XIV, XXXVI). Due to supplier information the following substances might occur, for which specific restrictions are defined:

d. Restriction Table

| CAS no. | Chemical Name | SML / Limitation |
|------------|------------------------|-----------------------|
| 1327-41-9 | Aluminium chlorhydrate | 1 mg/kg ⁱ |
| 124-17-4 | Butyldiglycolacetate | 5 mg/kg ⁱⁱ |
| 52-51-7 | Bronopol | 0,05 ⁱⁱⁱ |
| 55965-84-9 | CIT+MIT | 0,025 ^{iv} |

2. MIGRATION TEST

According to §31 of the German Food and Feed Code (Lebensmittel- und Futtermittelgesetz, LFGB) and the European Framework-Regulation VO (EC) No. 1935/2004 food contact materials may not release substances in food or its surface in quantities that could endanger human health, bring about an unacceptable change of the food or will influence the organoleptic properties (smell, taste) or the appearance of food (e.g. colour).

According to Recommendation XXXVI of BfR (Federal Institute for Risk Assessment) for paper and cardboard for food contact (as of 01.09.2017) material has to comply with limit values for Bronopol and Aluminium. The concerned migration tests have shown, that compliance could be achieved.

A NIAS screening (non-intentionally added substances) is intended to prove that possible reaction- and degradation products are harmless according to internationally accepted scientific standards for risk-assessment. Several NIAS-screening substances were detected above the detection limit of 10 ppb. Most of these could be identified being part of the wood. In the scope of the analyses performed and under the above test conditions there was no indication for an objection according to EU legislation.

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Based on the compositional information of the adhesive and the migration tests described above, the concerned adhesive may be **safely used for block gluing intended for chopping boards.**^v The final article manufactured with the adhesive dispersion above may have direct contact with foodstuffs as far as the adhesive is concerned.

This food contact status is based on the compositional information provided by the raw material supplier and is given to the best of our knowledge. However following article 1 of the Framework Regulation compliance can only be applied for the material or article in the finished state. The technical suitability for the final application needs to be determined by the user under the intended conditions of use. This might cover extraction and/or migration tests and the evaluation of the possible influence on the organoleptic properties of the food.

For additional information about this product, please contact your H.B. Fuller representative.

Responsible for content:

Alexandra Roß
Product Regulatory Specialist EIMEA

This document was prepared electronically and is valid without signature.

ⁱ Following Regulation(EU) 10/2011

ⁱⁱ Swiss Ordinance

ⁱⁱⁱ Swiss Ordinance

^{iv} BfR XIV and/or BfR XXXVI

^v Information is based on a wooden chopping board of approx. 1 kg weight, glued with 11 g of adhesive; 2 mm of the overall thickness were considered for the migration risk assessment

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