

Avery Dennison ADvantage: Complete Compliance

Avery Dennison ADvantage: Complete Compliance is a global service initiative that helps customers navigate the complexities of regulatory, trade and customer compliance issues. Complete Compliance delivers training, tools and

advice that guides customers through regulatory data and certifications to ensure products meet the compliance demands of specific applications.

U.S. Food Contact Products

Avery Dennison products that are used for food packaging and labeling may be subject to the main food safety law of the U.S., the Federal Food, Drug, and Cosmetics Act (FFDCA). Under this law, the U.S. Food and Drug Administration (FDA) regulates food and food additives.

The definitions of items regulated by the FDA are broad enough to encompass some Avery Dennison products and materials. A food contact substance (FCS) is defined as any substance that is intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food, if use of the substance is not intended to have any technical effect in such food. An FCS may be considered an indirect additive, which needs to be approved by the FDA. The approval may occur through listing in 21 Code of Federal Regulations Parts 173-186. These regulations contain separate sections for adhesive and coatings; paper and paperboard; polymers; and adjuvants, production aids, and sanitizers. In some cases, for additives not already approved, it may be necessary to submit a food contact notification to FDA before manufacturing or using an FCS.

A food packaging substance may be used without prior FDA review when there is a sound basis for concluding that it is not a food additive because it is not reasonably expected to become a component of food under the conditions of its intended use. This is a determination that a company can make when there is evidence for it based on extraction studies and/or calculations. These no migration determinations are made by experts who specialize in the testing, calculations, and records to support the determination.

Avery Dennison Product Compliance

Avery Dennison's product compliance team is part of Avery Dennison's core business, and includes experts on the requirements that apply to the products we sell for food packaging and labeling. Product compliance experts are involved in product development to ensure that the materials we use in food contact products comply with the requirements of the U.S. FDA.

Avery Dennison has a product compliance program to conduct the necessary analysis of our food contact products (e.g., labels, adhesives, and others), and to obtain clearances when required. Our product compliance team is available to support our customers with food product compliance data, including migration test results and other information on the suitability of our products for use with food. We provide food grade declarations and other certifications as necessary and applicable.

Information on the U.S. food contact requirements is available at:

<http://www.fda.gov/food/ingredientspackaginglabeling/packagingfcs/default.htm>

16042, 03/16, PDF

©2016 Avery Dennison Corporation. All rights reserved. Avery Dennison and all other Avery Dennison brands, product names and codes are trademarks of Avery Dennison Corporation. All other brands and product names are trademarks of their respective owners. Personal and company names and other information on samples depicted are fictitious. Any resemblance to actual names and addresses is purely coincidental.



Label and
Packaging Materials

North Asia
5th Floor, Hongye Park
1801 Hongmei Road,
Xuhui District 200233,
Shanghai, China
+86 21 33951888

**South Asia Pacific and
Sub-Saharan Africa**
151 Pasir Panjang Road #03-13/16
Pasir Panjang Distripark, Singapore
118480
+65.6349.0333

Europe
Willem Einthovenstraat 11
2342 BH Oegstgeest
The Netherlands
+31 85 000 2000

Latin America
Rodovia Vinhedo-
Viracopos, KM 77
CEP 13280-000
Vinhedo - SP, Brazil
+55 19 3876-7600

North America
8080 Norton Pkwy
Mentor, OH 44060
800.944.8511