



THE PACKAGING & FOOD-CONTACT MATERIALS GUIDE

Every roll traced to its film, ink and adhesive lots.

From resin and ink to the customer's roll, and back again in a complaint

A practical evaluation guide for film, laminate, board, tray and closure converters: when food-contact rules apply, what U.S. and EU rules actually ask for, how supplier declarations and test reports link to the intended use, what to do when a document is missing from a parent reel, and what the person deciding release should see.



FDA 21 CFR 170-178

EU 1935/2004 · 10/2011

INTENDED USE

PEOPLE DECIDE RELEASE

U.S. edition with EU scope notes / October 2026

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Scope: practical orientation, not legal advice. Photos are staged; lots, ranges and results are worked examples.

INSIDE THE GUIDE

One parent reel, two customer rolls.

Converters turn resin, film, ink, adhesive and board into a parent reel or sheet, then slit, cut or form it into many customer lots. This guide follows printed laminate reel MR-2207 into two rolls and shows what the record needs at each step.

01 / FRAME

pp. 03–05

Which rules apply

Food contact or not, U.S. FDA routes for food-contact substances, and EU 1935/2004, GMP and plastics rules.

02 / MAKE

pp. 06–10

Use, suppliers, print

Intended use and customer specification, supplier declarations, the evidence matrix, print and changeover, converting.

03 / TEST AND TRACE

pp. 11–12

Results and genealogy

In-house tests versus documented external reports, and one parent reel slit into two rolls.

04 / HOLD

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One document missing

A missing declaration and a seal result out of range, worked end to end, and who decides.

05 / SHIP

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Labels, declarations, complaints

Roll and pallet identity, outgoing declarations, complaints and trace, and software you rely on.

06 / APPLY

pp. 19–24

V5 fit, worksheets, sources

Where V5 fits and does not, two worksheets, a four-week evaluation and ten sources.

Who it is for. Plant, quality and technical managers at film, laminate, label, board, tray, bottle and closure plants; regulatory and product-stewardship leads; purchasing teams who review supplier declarations; and anyone choosing a production and quality system for a converting operation.

How to read it. Operational pages end with a teal Where V5 fits panel. Everything above it is regulation and practice; practice is labelled as such. Statements cite numbered sources; always check the current text.

WHERE V5 FITS

V5 records the receiving, supplier documents, job, print, converting, testing, labelling and quality work your procedures define. It does not calculate migration, decide whether a material is suitable for food contact, issue declarations of compliance, control presses or release lots. Those stay with your qualified people.

FRAME / 01

Food contact, or not?

The first question is not which test to run but what the material is and how it will be used. The same film can be food packaging for one customer and industrial wrap for another. Record the answer per product, customer and use.

QUESTION	STARTING POINT
Substances in food-contact articles sold in the U.S.	FDA food additive rules, 21 CFR 170–178, and FCNs [1][3][4]
Any food-contact material placed on the EU market	Regulation 1935/2004, plus GMP 2023/2006 [6][7]
Plastic food-contact materials in the EU	Also Regulation 10/2011, as amended [8][9]
EU materials without a specific EU measure	1935/2004 and GMP; national rules may add [6][10]
Packaging that never contacts food	Customer specification; other product rules
Print quality, strength, dimensions	Your customer's specification and contract

Intended use drives it

Food type, contact time and temperature, and which side touches food decide which rules and evidence apply. Capture them before quoting, not after printing.

No blanket FDA approval

FDA does not issue a general approval for a package. Each substance relies on a route such as a regulation, an effective notification or another basis FDA recognises [4][5].

Not every material, everywhere

A written declaration is required in the EU for materials covered by specific measures, such as plastics; it is not universal for every material or market [6][8].

PRACTICE: ONE USE PROFILE PER PRODUCT AND CUSTOMER

Record the structure, the customer, the intended food or non-food use, the conditions of use the customer states, the markets, the rules your team concluded apply and who concluded it. Review when any of them changes.

WHERE V5 FITS

V5 customer specifications and product records can carry the intended use, markets and your regulatory notes, and samples show the customer's market. V5 does not decide which rules apply or whether a material is suitable for food contact.

FRAME / 02

U.S.: how a food-contact substance is covered.

In the U.S., the question is usually about each substance that may migrate from the article into food, not the finished package as a whole. The record you need is which basis each substance relies on, and under what limits [3][5].

Regulation	Listed in 21 CFR Parts 175–178 (adhesives and coatings, paper and board, polymers, adjuvants), with conditions of use and limits [3]	175–178
Notification	Effective food contact notification for a substance, intended use and limits; effective only for the manufacturer identified [4]	FCN
Threshold	Exemption for very low expected dietary exposure under the conditions FDA sets, after FDA review [2]	170.39
GMP and purity	Amount no more than reasonably required; purity suitable for the intended use [1]	174.5(a)
Still adulteration law	A listed use does not relieve the article from other provisions, e.g. imparting taste or odor [1]	174.5(b)

WHY THE NOTIFIER MATTERS

FDA's inventory lists, for each notification, the substance, notifier, manufacturer, intended use, limitations and specifications. A notification is effective only for the manufacturer identified in it, so the same chemistry from another supplier needs its own basis. Record the supplier's basis by lot source, not by generic name [4].

WHERE V5 FITS

V5 supplier and material records can hold the supplier's stated basis, notification number and limits as documents linked to the approved material. Your regulatory people judge whether that basis covers your customer's use; V5 does not.

Sources: [1], [2], [3], [4], [5] (linked on pages 23–24)

Selling into the EU: framework, GMP, plastics.

The EU applies one framework to all food-contact materials, GMP to every stage of manufacture, and specific measures to some materials. Plastics are covered by the most detailed one [6][7][8].

1935/2004: traceability

Traceability of materials and articles must be ensured at all stages, through labelling or relevant documentation (Article 17). Materials under specific measures need a written declaration of compliance (Article 16) [6].

2023/2006: documented GMP

Operators keep a documented quality assurance system, a quality control system, and documentation of specifications, formulae, processing and records (Articles 5–7). Its annex covers printing inks on the non-food side [7].

10/2011: plastics declaration

At stages other than retail, a written declaration with the Annex IV content is available for plastics, intermediates and starting substances, renewed when substantial changes affect migration (Article 15) [8].

AMENDMENTS: READ THE CONSOLIDATED TEXT

10/2011 has been amended many times. Regulation (EU) 2025/351 amended 10/2011, the recycled plastics rules 2022/1616 and GMP 2023/2006 on quality control and manufacturing of plastics. Further amendments update the Union list. This guide does not restate transition dates; read the current consolidated text and the Commission's legislation page [8][9][10].

TRIGGER (PRACTICE)	TYPICAL REVIEW	ACTION
New ink, adhesive or film supplier	New declarations; check coverage of use	REVIEW
Structure or thickness change	Check declaration and test coverage	REVIEW
New food type or temperature	Check conditions of use in evidence	REVIEW
Same approved material, new lot	Record the lot; declaration normally holds	OK

WHERE V5 FITS

V5 change control can route a structure or supplier change to the people who review declarations and test coverage before the new specification revision is issued. V5 does not decide whether a change is substantial or alters migration.

MAKE / 01

Start with the intended use and the specification.

A converter rarely knows the food better than its customer. The customer's specification should state the use; your record should hold that statement, its revision and what your team concluded from it, before the first job runs.

USE PROFILE FIELD	WORKED EXAMPLE
Customer and item	Customer C-41 · lidding laminate · CS-118 rev C
Structure	Printed PET 12 µm / adhesive / PE sealant 50 µm
Food-contact side	PE sealant layer; print reverse-side, buried
Food type (customer stated)	Chilled cooked meats
Conditions (customer stated)	Chilled storage; no heating in pack
Markets	U.S. and EU
Customer tests	Seal strength, dimensions, print and registration
Concluded by	Regulatory lead, recorded with rev C

Their words, recorded

Store the customer's statement of use as they gave it. If it is vague, ask; do not fill gaps with assumptions.

Revisions travel with jobs

Each job issues the specification revision it was quoted and planned against, so a later change is visible.

Non-food is a use too

Industrial or non-food packaging should be recorded as such, so nobody later treats it as food-grade.

WHERE V5 FITS

V5 customer specifications capture how the pack must read and the customer's market, and the job carries the issued specification revision. Your team decides what the stated use means for materials and evidence.

MAKE / 02

Every input lot, with its documents.

Resin, film, ink, adhesive, coating, board and additive suppliers provide the declarations and certificates your conclusions rest on. What you record at receiving decides whether you can later show which evidence covered which lot.

INPUT (WORKED EXAMPLE)	LOT	EVIDENCE	USE?
PET film	F-6610	Declaration and certificate on file	YES
PE sealant film	S-4471	Declaration and certificate on file	YES
Ink set (reverse side)	K-0932	Supplier statement on file	YES
Laminating adhesive LA-50	3318	Updated declaration not received	PENDING
Cores and stretch wrap	C-118	Spec certificate on file	YES

Declarations by revision

A declaration describes a specific product and revision. A reformulated adhesive needs its new declaration, even under the same trade name.

Check what it covers

Read the conditions of use, food types and limits stated. A declaration for room-temperature dry food may not cover a hot-fill use.

Expiry and review dates

Record review dates for supplier documents and certificates so out-of-date evidence is flagged before it is relied on.

WORKED EXAMPLE: A NEW REVISION, AN OLD DECLARATION

Adhesive LA-50 lot 3318 is the supplier's new revision. The declaration on file covers the previous revision only. Purchasing requests the updated declaration; the lot is recorded as pending and anything made with it stays on hold until a person reviews the document.

WHERE V5 FITS

V5 receiving records lots with supplier identity and documents, holds a lot as pending, and supplier qualification and portal document submission keep evidence against your specification. Your team sets what each material needs and who may accept it.

MAKE / 03

Does the evidence cover this use?

A declaration or test report is evidence for a defined material, structure and set of conditions. The useful question is not whether a document exists but whether it covers this product, for this customer's use. Map it.

COVERED

Same material, use covered

Current declaration or report names the material and covers the stated food type and conditions. Record and link it.

GAP

Material or use not covered

Revision, structure, food type or temperature falls outside what the evidence states. Hold and ask.

MISSING

Document not on file

Required declaration or report has not arrived. The lot and everything made with it stay pending.

EVIDENCE MATRIX (WORKED EXAMPLE)	WHAT THE EVIDENCE STATES	STATUS
PET film F-6610	Declaration rev 2 · chilled foods	Covered
PE sealant S-4471	Declaration rev 5 · chilled and frozen	Covered
Ink set K-0932	Reverse side, buried; set-off controls	Covered
Adhesive LA-50 lot 3318	Declaration for previous revision	PENDING
Finished structure	External migration report not on file	PENDING

People judge coverage. Whether a report or declaration covers a use is a technical and regulatory judgment. The matrix makes the judgment, its basis and its owner visible; it does not make it automatic. Migration testing or other evidence is done by qualified laboratories and people, outside V5.

WHERE V5 FITS

V5 links supplier documents and external reports to materials, specifications and lots, and keeps a missing or out-of-date document visible as pending. V5 does not calculate migration, interpret test reports or decide coverage.

MAKE / 04

Right artwork, right inks, clean changeover.

A print error such as wrong allergen text, a wrong barcode or a superseded version can force a customer's product withdrawal. In the EU, inks on the non-food side must also not transfer through the substrate or by set-off in the stack or reel [7].



Approved artwork only

The artwork and plate revision approved by the customer is issued with the job; superseded artwork cannot start a run.

Line clearance

Remove the previous job's plates, inks, labels and waste before the next run, and sign it.

Set-off and cure

Follow your procedure for ink and adhesive cure and set-off checks before slitting; record what it requires.

BEFORE JOB J-2207 (WORKED EXAMPLE)	RECORD	OK?
Previous job removed (plates, rolls, labels)	Cleared, signed 06:40	YES
Artwork revision vs approved	Rev 4 matched on tablet	YES
Ink set lots scanned	K-0932	YES
First-off print and registration check	Recorded, signed	YES
Barcode grade check (customer spec)	Recorded	YES

WHERE V5 FITS

V5 changeover checklists record line clearance and first-off checks with sign-off before the run, if configured, and the job carries the approved artwork revision. Your team and customer approve artwork content; V5 does not.

MAKE / 05

Laminate, slit, form: record the steps.

Lamination, curing, slitting, thermoforming and bag making change the material's identity. The record should show which lots went in, which equipment and steps were used and what came out, without the system pretending to run the machines.



Steps, not set-points

The record holds the steps and checks your instructions require; temperatures, speeds and nip pressures are your technical team's settings.

Identity changes

Each lamination, slit or forming run creates new lot identities linked to their inputs, with quantities.

Gauges and instruments

Thickness gauges, seal testers and scales need calibration records before their results are relied on.

WHERE V5 FITS

V5 work orders record each converting step, operator, equipment and input lots, and calibration records can block out-of-calibration gauges. V5 records equipment status; it does not control presses, laminators, slitters or formers.

TEST / 01

In-house results and documented reports.

Converters usually test what the customer's specification asks for in-house, and rely on suppliers' declarations and external laboratories for migration and composition evidence. Keep both with the lot, and keep them separate.



Customer ranges

This guide quotes no seal strength or other values. Your customer and technical team set each range and method.

External reports

Record what the report tested: structure, simulants or foods, time and temperature, laboratory and date.

Valid while unchanged

EU plastics text notes test results stay valid while formulation and processing stay constant within a quality assurance system [8].

EVIDENCE (WORKED EXAMPLE, CUSTOMER RANGES)	RESULT	STATUS
MR-2207-A · seal strength	Below customer range	OUT
MR-2207-B · seal strength	Within customer range	YES
MR-2207 · thickness and width	Within range	YES
Structure · external migration report	Not on file	PENDING

PRACTICE: PENDING IS A STATUS

A report or result that is not on file stays visibly pending on every affected lot, so nobody reads a partial record as complete. An out-of-range result opens a nonconformance before anyone re-tests to a pass.

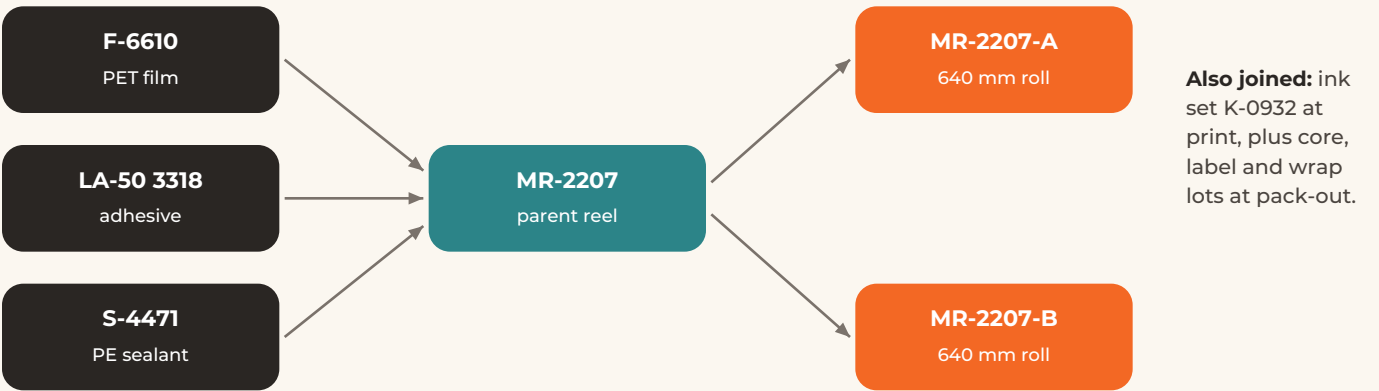
WHERE V5 FITS

V5 Lab & QC records results against your specifications, keeps pending evidence visible, and attaches external laboratory reports to lots. Methods, ranges and the reading of reports stay with your lab and technical team.

TEST / 02

One parent reel, many customer lots.

Lamination joins lots; slitting splits one parent reel across its width into several rolls, often for different customers. Genealogy records each join and split, with quantities, so a question about one lot reaches every related lot.



FROM	TO	QUANTITY	NOTE (WORKED EXAMPLE)
F-6610 + K-0932 + LA-50 3318 + S-4471	MR-2207	1,300 mm x 6,000 m	Job J-2207, CS-118 rev C
MR-2207	MR-2207-A	640 mm x 6,000 m	Customer C-41
MR-2207	MR-2207-B	640 mm x 6,000 m	Customer C-41
MR-2207	Edge trim	20 mm x 6,000 m	Recorded as waste

Siblings share a question. Rolls A and B share every input lot and the same laminating run. A problem traced to an input or the run touches both; a problem at one slitting position may touch only one roll, but only that roll's own evidence can show it.

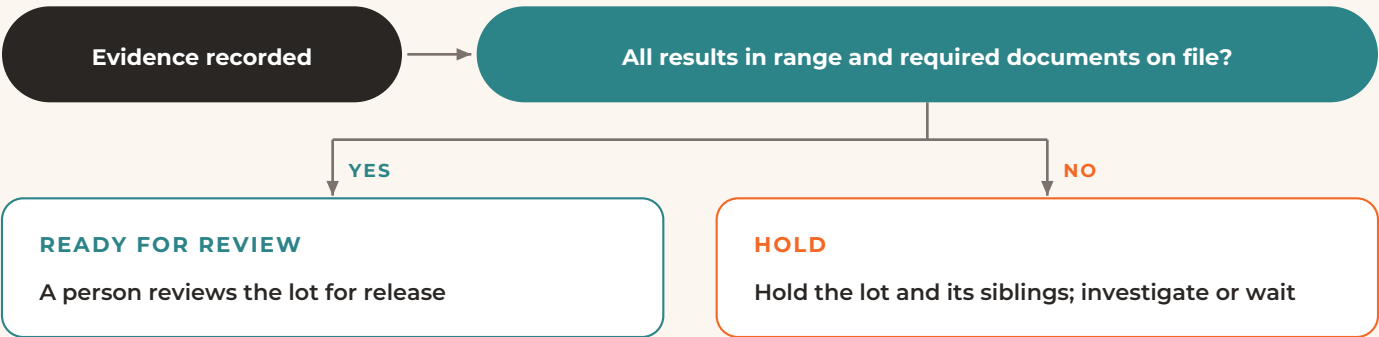
WHERE V5 FITS

V5 traceability records inputs, transfers and outputs with lots and quantities and shows the tree forward and back from any lot. Accuracy depends on recording every split, rewind, rework and waste quantity.

HOLD / 01

One document missing, worked end to end.

11:40: roll MR-2207-A reads below the customer's seal strength range. Roll MR-2207-B is in range, but both rolls share adhesive lot 3318, whose updated declaration is missing, and the structure's external report is not on file.



TIME	STEP (WORKED EXAMPLE)	STATUS
09:10	LA-50 lot 3318 received; updated declaration missing	PENDING
10:55	MR-2207 slit into rolls A and B; both on hold	Done
11:40	Roll A seal strength below range; NC-0412 opened	Done
11:45	Roll B kept on hold: same adhesive lot, report missing	Done
14:20	Review of sealing station records for roll A	Done
15:05	QA records disposition for roll A	Done

Both rolls take the NO branch. Roll A has a result out of range; roll B has every result in range but two required documents are missing. Neither is ready for review. Roll B is not cleared by assumption; it waits for its own evidence.

WHERE V5 FITS

V5 can place lots on hold when your team links a nonconformance or a pending document to them, lists sibling lots and shipments from the same parent and keeps the investigation with the lot. V5 does not decide whether a lot is acceptable.

HOLD / 02

A person decides, and the record says who.

Outcomes depend on your procedures, the customer's agreement and the evidence: release once evidence is complete, rework or re-slit under an approved instruction, use for a different, agreed non-food purpose, or reject. A qualified person decides.

Release	Rework	Reject
All results in range and all required evidence reviewed. Record the basis and who decided.	Only under an approved instruction, with the reworked lot re-tested and genealogy kept.	Lot cannot go to this customer. Record quantities, destination and who decided.
DISPOSITION RECORD FIELD	WORKED EXAMPLE	
Lot	MR-2207-A, one 640 mm roll	
Evidence	Seal strength result, sealing records, NC-0412	
Decision	Rejected for this customer (worked example)	
Sibling MR-2207-B	On hold; adhesive declaration and report pending	
Decided by	QA manager, e-signature, 15:05	
Follow-up	Supplier request open; CAPA CA-0388 for sealing	

The example is not a rule. Another team, with other evidence and another customer agreement, might decide differently. What matters is that each lot's decision, basis and owner are recorded, and that no affected lot is released before its own evidence is reviewed.

WHERE V5 FITS

V5's QC release queue shows each lot's results, holds, pending documents and nonconformances in one view. A named reviewer records the decision with an electronic signature. V5 never releases or rejects product automatically.

SHIP / 01

Every roll and pallet knows what it is.

Roll labels, pallet labels and shipping documents carry the identity that makes traceability work downstream. In the EU, materials must be identifiable through labelling or documentation that allows traceability [6].

PACK-OUT CHECK (WORKED EXAMPLE)	RECORD	OK?
Roll label: lot, item, spec revision	MR-2207-B, CS-118 rev C	YES
Roll length and width	6,000 m x 640 mm	YES
Status at pack-out	On hold; not shippable	HOLD
Pallet label and barcode check	Not printed while on hold	n/a
Shipment and consignee	None	n/a



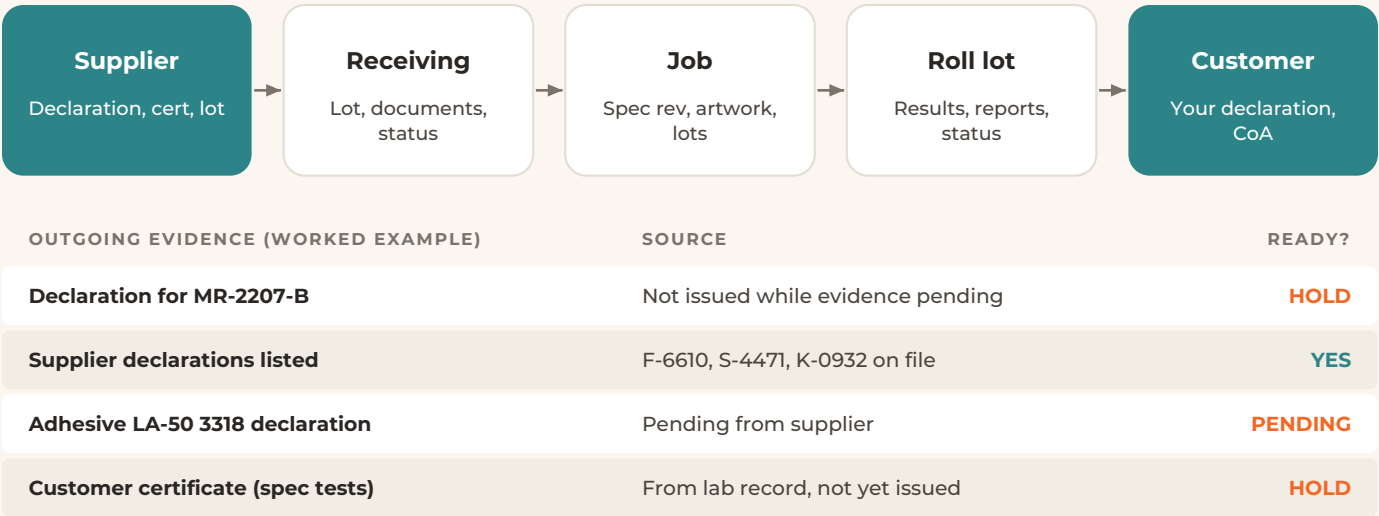
WHERE VS FITS

VS label design prints roll and pallet labels with lot codes and barcodes from the lot record, checks the barcode at pack-out and shows each lot's hold status. Label content stays your team's approval.

Sources: [6] (linked on pages 23–24)

From supplier declaration to your declaration.

Your customer's declaration of compliance or other evidence rests on yours, and yours rests on your suppliers'. In the EU, the business operator issues the plastics declaration with its supporting documentation [8].



Your document, your review

Your qualified people prepare and sign your declarations. A system can assemble the linked evidence; it cannot conclude compliance.

Never ahead of evidence

Do not issue a declaration or certificate for a lot with pending documents or results.

Renew on change

EU plastics declarations are renewed when substantial changes affect migration or new scientific data arrive [8].

WHERE V5 FITS

V5 LIMS generates certificates from recorded results, controlled documents hold your issued declarations, and the customer portal can share lot trace and documents, depending on plan. Your team decides what is issued and shared.

Sources: [8] (linked on pages 23–24)

SHIP / 03

From a customer complaint to every lot.

A complaint about delamination, odor, a seal failure or a print error starts with one roll or carton. The first hours are about finding the parent, the input lots, the siblings and every shipment, then deciding with people who know the product.

TRACE STEP	RECORD (WORKED EXAMPLE)	STATUS
Complaint received	Customer C-41 reports seal failures on packs from one roll	Done
Roll identified	From roll label: lot MR-2201-B (a different, shipped week)	Done
Trace back	Parent MR-2201, adhesive lot 3290, film lots, laminating run	Done
Trace forward	Sibling MR-2201-A and other reels using lot 3290	Done
Stock and shipments	On hand, on hold and shipped listed by customer	Done
Decision	QA and the customer agree next steps	REVIEW

Trace both ways

Back to every input lot and run; forward to siblings, other reels using the same lots and every shipment.

Mock exercise

Time a trace from one adhesive or ink lot. Record what was found, what was missing and who did what.

Close the loop

Link the complaint to the nonconformance, CAPA and any supplier request, so the next lot shows the action taken.

PRACTICE: COMPLAINTS ARE EVIDENCE

Trend complaints by structure, input lot and line. A cluster around one adhesive lot is a reason to look at every roll it went into.

WHERE V5 FITS

V5 records customer complaints and investigations against lots, traces from any lot to inputs, siblings and shipments, and records mock recalls with timings. Recall and customer-notification decisions stay with your people.

SHIP / 04

The software you rely on.

Food-contact rules require documented quality systems and records rather than a specific software validation method, but your declarations, holds and genealogy are only as good as the system that holds them. Know what it does and test it.

01

Define its job

Which records it holds, which checks it enforces and which decisions it supports.

02

Test with your data

Run your specifications, supplier documents, splits, artwork revisions and holds before relying on it.

03

Control change

Assess supplier releases and configuration changes before they reach production.

04

Keep a fallback

Decide how records are kept if the system or network is unavailable, and how they are entered later.

WHO DOES WHAT

You decide the intended use, test it and approve go-live, including any performance qualification your customers expect. **A supplier** can provide documentation and, where agreed, installation and operational qualification support. In V5's case, IQ/OQ and validation support are part of the Enterprise plan, scoped in the accepted quote or statement of work.

WHERE V5 FITS

V5 records configuration changes in an audit trail and releases software in versions, so you can see what changed. It does not make a material, a declaration or a quality system compliant on its own.

APPLY / 01

Where V5 fits, and where it does not.

A plain map from the area to the V5 capability that keeps its record, and the decision that stays with you. Capabilities are from the V5 product reference reviewed 1 October 2026 and depend on plan and configuration.

AREA	V5 KEEPS THE RECORD	YOUR PEOPLE DECIDE
Intended use	Customer specs, markets, revisions	What the use requires
Supplier evidence	Qualification, documents, portal submission	Whether evidence covers use
Receiving	Lots, documents, pending status, holds	Acceptance criteria
Print	Artwork revision, changeover checklists	Artwork content
Converting	Work orders, steps, lots, equipment	Process settings
Testing	Lab & QC results, attached reports	Methods, ranges, reading
Genealogy	Joins, splits, quantities, trace	Scope of a question
Release	QC release queue, e-signature	The decision itself
Declarations	Controlled documents, linked evidence	Content and signature
Complaints	Intake, investigation, CAPA, trace	Actions, notices

Coming soon, not available today: AI demand and yield forecasting and process anomaly detection.
Plan-dependent: device integration, customer and supplier portals, and IQ/OQ and validation support (Enterprise only, scoped in the accepted quote or statement of work). **Not offered:** migration calculation or modelling, automatic compliance decisions or declarations, control of presses or converting equipment, or regulatory submissions.

WHERE V5 FITS

Nothing in V5 calculates migration, decides that a material is suitable for food contact, issues a declaration, releases a lot or starts a recall. It keeps the evidence connected so the qualified people who make those decisions can see it.

WORKSHEET 01

Evidence readiness for one roll lot.

Use with a real (or test) job record. Tick what the record shows today without asking anyone.

	SHOWN	PARTLY	NOT SHOWN
Intended use Customer's stated use, markets and specification revision on the job	☐	☐	☐
Input lots Every input lot recorded with supplier and status	☐	☐	☐
Supplier documents Current declaration or certificate for each input, by revision	☐	☐	☐
Coverage Who judged that evidence covers this use, and when	☐	☐	☐
Artwork Approved artwork revision matched; line clearance signed	☐	☐	☐
Converting Steps, equipment and operators recorded; gauges in calibration	☐	☐	☐
Results Every customer-spec test against its range	☐	☐	☐
Pending and siblings Pending documents visible; sibling rolls listed with status	☐	☐	☐
Genealogy Inputs to parent to rolls, with quantities and waste	☐	☐	☐
Named decision Who decided, when, on what evidence	☐	☐	☐

NOTES AND OWNERS

WORKSHEET 02

Questions for any software demo.

Ask the vendor to show, not tell, using test data. Record what you saw.

	SHOWN	PARTLY	NOT SHOWN
Missing document Receive a lot without its declaration; show the pending status.	☐	☐	☐
Old revision Show a declaration that covers only the previous material revision.	☐	☐	☐
Held input Try to issue a pending lot to a job; show the block or hold.	☐	☐	☐
Artwork Try to start a run on superseded artwork.	☐	☐	☐
Split Slit one parent into two rolls; show both in the genealogy.	☐	☐	☐
Out of range Record a seal result out of range; show the hold and nonconformance.	☐	☐	☐
Siblings From one roll, list its siblings and their evidence status.	☐	☐	☐
Declaration Show your issued declaration and the evidence linked to it.	☐	☐	☐
Complaint trace From one roll, list inputs, siblings and customers, timed.	☐	☐	☐
Audit trail Show who changed a value, when and why.	☐	☐	☐

NOTES AND OWNERS

APPLY / 02

A fair evaluation in four weeks.

A practical way to test any system with your own people and one real product family, without touching live records.

WEEK 1

Agree one structure family and the five questions that matter most. Load materials, suppliers, documents, specifications and checks.

WEEK 2

Run a job end to end with test data: receipts, artwork, print, laminate, slit into two rolls, tests, release review.

WEEK 3

Break it on purpose: missing declaration, old artwork, seal result out of range, unsigned clearance, held roll at pack-out.

WEEK 4

Run a timed complaint trace from one roll and from one adhesive lot. Review with QA, production, purchasing and IT.

Rules for the evaluation. Use test data only. Keep your current records, declarations and release process live until a tested change is approved. Record what was shown, not what was promised.

ASK V5

“We make [film / laminates / board / trays / closures] at [number] sites. Our hardest moment is [e.g. a missing supplier declaration]. Which workflows should we evaluate first?”

Start a 7-day free trial, no card required, or ask V5 on v5ultimate.com.

WHERE V5 FITS

Try V5 with your own product family in a trial workspace using test data. The assistant answers questions about features and plans; it does not give regulatory advice.

SOURCES

Keep the evidence close.

Sources behind this guide. U.S. rule text and EU 1935/2004, 2023/2006 and 10/2011 text read 3 October 2026; others checked against official listings. Click a title.

- | | | |
|-----|---|-------------------------|
| [1] | <u>U.S. eCFR, 21 CFR 174.5: general provisions for indirect food additives</u> | BINDING U.S. REGULATION |
| [2] | <u>U.S. eCFR, 21 CFR 170.39: threshold of regulation for food-contact articles</u> | BINDING U.S. REGULATION |
| [3] | <u>U.S. eCFR, 21 CFR Parts 175 to 178: indirect food additives</u> | BINDING U.S. REGULATION |
| [4] | <u>U.S. FDA, Inventory of Effective Food Contact Substance Notifications</u> | FDA DATABASE |
| [5] | <u>U.S. FDA, Packaging & Food Contact Substances (FCS)</u> | FDA INFORMATION PAGE |
| [6] | <u>Regulation (EC) No 1935/2004 on food-contact materials and articles</u> | BINDING EU REGULATION |
| [7] | <u>Regulation (EC) No 2023/2006 on good manufacturing practice for food-contact materials</u> | BINDING EU REGULATION |
| [8] | <u>Regulation (EU) No 10/2011 on plastic materials and articles</u> | BINDING EU REGULATION |

SOURCES

Sources, continued.

[9] [Regulation \(EU\) 2025/351 amending 10/2011, 2022/1616 and 2023/2006](https://eur-lex.europa.eu/eli/reg/2025/351/oj)

BINDING EU REGULATION

<https://eur-lex.europa.eu/eli/reg/2025/351/oj>

[10] [European Commission, Food contact materials: legislation](https://food.ec.europa.eu/food-safety/chemical-safety/food-contact-materials/le...)

COMMISSION INFORMATION

<https://food.ec.europa.eu/food-safety/chemical-safety/food-contact-materials/le...>

How to read the status labels. Binding regulations are law in their jurisdiction. The FDA inventory and information page and the Commission page explain and list; they are not themselves the rules. EU regulations are cited by their official reference; read the current consolidated version, because 10/2011 and 2023/2006 have been amended.

SCOPE AND LIMITS

This guide is practical orientation for evaluating packaging and food-contact materials operations and software. It is not legal or regulatory advice and does not list every requirement that applies to you. It covers selected U.S. federal and EU rules; national, recycled-material, specific-substance, customer and certification requirements add to them. Regulatory text was checked on 3 October 2026; confirm the current text before relying on it. V5 capability statements reflect the V5 product reference reviewed on 1 October 2026 and depend on plan, configuration, devices and permissions. AI forecasting and anomaly detection are coming soon. V5 does not calculate migration, decide food-contact suitability, issue declarations, control converting equipment, release or reject lots, report to regulators or decide recalls, and does not by itself make you compliant. Photography is illustrative; lots, ranges and results are worked examples, not customer data.



Every roll traced to its film, ink and adhesive lots.

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