

## DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES INTENDED TO COME IN CONTACT WITH FOOD

### MANUFACTURER

The manufacturer or his authorized representative established in the Community:

Name of the manufacturer: Packaging Donckers  
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### PRODUCT DESCRIPTION

Product name: Virgin fiber cardboard  
Type of board: virgin fiber  
Grammage cardboard: 265 - 325g/cm<sup>2</sup>

### COMPLIANCE STATEMENT

Product stated above complies with:

- Directive 2023/2006 / EC. Concerning Good Manufacturing Practices for materials intended to come into contact with food.<sup>1</sup>
- Directive 1935/2004 / EC. Relevant materials intended to come into contact with food.<sup>2</sup>
- BfR recommendation no. XXXVI, 1 September 2017, Germany  
Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 221st Announcement, Bundesgesundheitsblatt 61 (2018) 236, as of 1 September 2017.
- FDA regulations, 21 CFR Ch. I, parts 176.170 and 176.180, 1 April 2018, USA
- French demands of the Degree no. 2007-766, 10 May 2007
- Italian Ministry Decree (21st of March 1973) and subsequent amendments
- Law concerning the revision of the foodstuffs, consumer Goods and Animal Feed Legislation of updated version, 30th June 2017 §§ 30 and 31, Germany
- Directive 2011/65/EU of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment 21 November 2017 regarding the content of polybrominated bisphenyls, polybrominated diphenyl ethers and heavy metals.

<sup>1</sup> COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food

<sup>2</sup> Regulation (EC) no 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC – Article 16



- Regulation EC 94/62 Packaging and Packaging Waste directive and the latest amendment concerning metals
- The regulation of the Coalition of Northern Governors of the USA (CONEG), concerning the amount of metals
- Guidance for Industry: Preparation of Premarket Submissions for Food Contact Substances (U.S. FOOD & DRUG administration, 2007) Microwave-use for aqueous foods
- EN 13432 Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging state Dec. 2000, regarding chemical characteristics, biodegradability, ecotoxicity (compost quality) and disintegration.
- PTS Method RH: 021/97. In view of the test results and based on the criteria of PTS. Method RH: 021/97, the material is rated as recyclable and repulpable

The board is suitable as packing material both for dry and non-fatty foods as well as moist and fatty foods, provided that in the latter case only the back surface is in direct contact with food at temperature up to 90°C.

The board may be used safely for food packaging high temperatures and hot sterilization up to 121°C. It may stand in direct contact with dry and fatty foodstuffs. In addition, the paper grade may stand in direct contact with moist foodstuffs with its uncoated back side.

The article can be used at freezer conditions

### STORAGE

The appropriate handling and storage conditions of product shall be utilized to ensure the safe use. The maximum storage time in unbroken package is twelve months (in RH50%, 23°C).

### ANTIMICROBIAL AGENTS

Absence of inhibition zones have been confirmed by standard EN 1104 (Hemmhof-test).

### MOSH - MOAH

Mineral oils typically originate from recycled fiber material and inks. Kotkamills Oy's board contain only virgin fibres avoiding the topic of mineral oils. Mineral oils are not added or used as raw materials in the manufacturing of this product.

### PHTHALATES

Analysis with GC/MS from 24 hours ambient iso-octane extract gives the following results:

- DIBP < 1 mg/kg
- DBP < 1 mg/kg
- BBP < 1 mg/kg
- DNOP < 1 mg/kg
- DEHP < 1 mg/kg
- DMP < 1 mg/kg



### BISPHENOL A

In production of this board grades Bisphenol A is not intentionally added to the products, nor detected in the screening analyses.

### FORMALDEHYDE

Content according to EN 1541 below the determination limit (0,004 mg/g).

### TOTAL PCB AND PCP

Content according to EN ISO 15318 (PCB) and EN ISO 15320 (PCP) is below determination limit (0,01 mg/kg)

### METALS

Metals from cold water extract according to EN ISO 12498:

Metal	Cadmium, Cd	Mercury, Hg	Lead, Pb	Chromium, Cr
Content	<0,001	<0,001	<0,001	<0,004
Unit	mg/kg	mg/kg	mg/kg	mg/kg

### OPTICAL BRIGHTNERS (OBA)

Optical brighteners are used to control the shade and brightness of the products. The fastness of fluorescent whitening agents is determined according to EN 648 (long duration contact) by external laboratory. The declaration of conformity of each grade is given based on these results.

### GMO

As defined by European Union are not intentionally added in the production of paperboard.

### SENSORIAL PERFORMANCE

Flavour tests in accordance with method EN 1230-2 (Robinson) has been carried out in external laboratory. No statistically confirmed difference could be noticed between the chocolate which had been stored in direct contact with the sample and chocolate which had been stored without the sample.

### REACH

This paper grade is defined as articles without intended release according to REACH. Consequently this means that registration doesn't apply for our paper and board grades. There is not any substances intentionally added containing above 0.1% (w/w) of a Substance of Very High Concern that will be published on the Candidate List we will inform you as REACH requires. We continuously follow the development of the candidate list and the substances for authorisation. To our knowledge today this article does not contain any Substance of Very High Concern that is on the Candidate List in a concentration above 0.1%(w/w).

### ALLERGENS

Substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of our product.



However, raw materials may contain wheat. Based on the information given by our supplier, the gluten content of the final product does not exceed 20 mg/kg. According to "Commission Regulation (EC) No 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten" and "Food Labeling; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA" gluten free labelling for food can be used if the gluten content does not exceed 20 ppm (= 20 mg/kg).

### DUAL-USED ADDITIVES

Dual use additives according to EU VO 10/2011 are additives that are permitted for the production of plastic materials & articles and are simultaneously permitted as a food additive or flavor / color.

This material can contain the following dual use additives:

Substance	E number	ADI (Acceptable Daily Intake)
Sodium nitrate	(E251)	ADI for E251-E252 3.7 mg/kg
Malic acid	(E296)	
Citric acid	(E330)	
Adipic acid	(E355)	ADI for E355-E357 5 mg/kg
Xanthan gum	(E415)	
Sorbitan monolaurate	(E493)	ADI for E491-E495 25 mg/kg
Sorbitan monostearate	(E491)	
Sodium sulphate	(E514)	ADI 10 mg/kg
Hydroxides	(E524)	
Silicon dioxide	(E551)	
Magnesium silicate	(E553a)	ADI 10 mg/kg
Talc	(E553b)	
Polyethylene glycol	(E1521)	ADI 10 mg/kg
Glutaral	(FL No 05.149)	

### REACH

Our paper and board grades are defined as articles. Thus registration doesn't apply for our paper and board grades. All chemicals and additives used by Kotkamills Oy as downstream user fulfill the REACH requirements. We do not intentionally add any substances containing above 0.1% (W/W) of Substance of Very High Concern (SVHC) that will be published on the Candidate list. We continuously follow the development of the candidate list and the substances for authorization.

### DISCLAIMER

This declaration is only valid under the following conditions:

- The product is used in normal intended conditions and purposes (use).
- No changes and / or substances (intentional, non-intentional and / or through use) are applied to the product and / or added that the nature and composition (a degeneration and / or a denaturation) of the product could be affected.
- The product may only be used for the foods, contact times and contact temperatures stated in this declaration.

Limiting factors:

- Our products are only suitable for single use. When re-used, mechanical and / or other properties are changed, the food suitability is not guaranteed and is not covered by this document.
- Our products are not suitable for packaging food for infants.



It is the sole responsibility of the user to check and test whether the product is suitable for its intended use, the shelf life of the food, the compatibility between the food and the product.

It is the sole responsibility of the user to test whether the product does not alter the organoleptic properties and / or composition of the food.

The information stated in this statement was provided by the supplier of the relevant product(s).

Signature + stamp:

Steven VAN HUMBEECK  
CEO

