

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

7 February 2022

Dr. Dr/Hf-db

**UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE**eingetragen  
registered no.  
registré

56385 U 22

für  
for  
pourSuzano S.A.  
Av. Brigadeiro Faria Lima 1355  
01452-919 Sao Paulo  
BrazilProdukt  
Product  
ProduitMucuri Line 1 – EC' bleached eucalyptus kraft pulp  
Mucuri Line 2 – ECF bleached eucalyptus kraft pulp  
Mucuri Line 2 SD – ECF bleached eucalyptus kraft pulp

The products manufactured by the company mentioned above are ECF bleached pulp grades which are used for the manufacture of papers and boards for food packaging and for baking purposes, of cooking and hot filter papers as well as of cigarette papers.

They were examined by us according to the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 26.02.2015,

(BfR-"Collection of methods for the examination of paper and board for food contact" of the, current state), in connection with the BfR guideline "Examination of the transfer of substances from consumer products made of paper and board", as of 26.02.2015),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2021 edition),  
§ 176.170,

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

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The pulp grades are in compliance with the rules of the

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, Official Journal of the European Union L 338/4 of 13.11.2004, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3, 1. (a) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253), zuletzt geändert durch Artikel 7 des Gesetzes vom 27. September 2021 (BGBl. I S. 4530), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl. I. p. 4253), last amendment by article 7 of the law of 27 September 2021 (BGBl. I p. 4530), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021),

as well as to the

BfR-Empfehlung XXXVI/1. Koch- und Heißfilterpapiere und Filterschichten, neugefasst durch 200. Mitteilung, Bundesgesundheitsblatt 42 (1999) 817, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021,

(BfR Recommendation XXXVI/1. Cooking Papers, Hot Filter Papers and Filter Layers, recasted by 200<sup>th</sup> Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021),

and to the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181<sup>st</sup> Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021),

as well as to the

BfR-Empfehlung XXXVI/3. Saugelagen auf Basis von Cellulosefasern für die Verpackung von Lebensmitteln, 205. Mitteilung, Bundesgesundheitsblatt 45 (2002) 936, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021,

(BfR Recommendation XXXVI/3. Absorber Pads based on Cellulosic Fibres for Food Packaging, 205<sup>th</sup> Announcement, Bundesgesundheitsblatt 45 (2002) 936, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021).

Furthermore, the pulp grades are in compliance with the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2021 edition), §§ 176.170 and 176.180.

The papers manufactured with them are in compliance with the

Verordnung zur Umsetzung der Richtlinie über Tabakerzeugnisse und verwandte Erzeugnisse vom 27. April 2016 (BGBl. I S. 980), § 4,

(Decree for the implementation of the Directive concerning tobacco and related products of 27 April 2016 (BGBl. I p. 980), § 4),

as far as the pulp grades are concerned.

Thus, the ECF bleached pulp grades **Mucuri Line 1 – ECF bleached eucalyptus kraft pulp**, **Mucuri Line 2 – ECF bleached eucalyptus kraft pulp** and **Mucuri Line 2 SD – ECF bleached eucalyptus kraft pulp** according to the sample material submitted may be used safely for the manufacture of papers and boards for food packaging and for baking purposes, of cooking and hot filter papers as well as of cigarette papers. The finished products manufactured with them may stand in direct contact with dry, moist and fatty foodstuffs as far as the pulp grades mentioned above are concerned.

This certificate of compliance has a validity of 2 years and consists of 3 pages.

Certification decision



amtlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Papp,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**Staatlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit**

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

State registered expert for the analysis of contrasting samples of packaging materials of paper, board, plastics, glass, tin plate and other metallic packaging materials as to their suitability for use with foodstuffs.

Expert public pour l'étude du contrôle des contre-échantillons d'emballages de papier, cartons, plastiques, verre, fer-blanc et d'autres emballages métalliques concernant leur conformité alimentaire.



Dr. Ralph Derra

Authorized expert for the analyses of soil and air, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse du sol et de l'air, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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