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Verpackungsmaterialien, Boden- und Luftanalysen;  
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26 November 2021

Dr. Dr/Hf-pf

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

55896 U 21

für  
for  
pourSuzano Papel e Celulose SA  
Unidade Limeira  
Estrada de Lageado s/n  
13486-199 Limeira - SP  
BrazilProdukt  
Product  
Produit

ECF Eucalyptus Pulp

The product manufactured by the company mentioned above is an ECF bleached pulp grade which is 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.

It was 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),

for the used raw materials and fabrication additives as well as for the release of substances which might endanger health.

The pulp grade is 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 Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 10 des Gesetzes vom 21. Mai 2021 (BGBl. I S. 1087), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 10 of the law of 21 May 2021 (BGBl. I p. 1087), §§ 30 and 31),

and is 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, neu gefasst 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. Saugelinagen 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, it may be used for the manufacture of paper for tobacco products. Paper grades such as plug wrap, tipping and filter tipping papers manufactured with it and used in the manufacture of tobacco products are in compliance with the demands of the

Gesetz zur Umsetzung der Richtlinie über Tabakerzeugnisse und verwandte Erzeugnisse of 4 April 2016 (BGBl. I p. 569), § 5,

as well as with the

Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse of 27 April 2016 (BGBl. I p. 980), § 4, modified by article 1 of the Decree of 17 March 2017 (BGBl. I p. 1201)

and may be used as intended, as far as the pulp grade is concerned.

For the conformity assessment, the demands of the

Verordnung über Tabakerzeugnisse (Tabakverordnung) of 20 December 1977 (BGBl. I p. 2831), last amendment by article 1 of the Decree of 22 December 2014, (BGBl. I p. 2398),

were used.

Thus the ECF bleached pulp grade **ECF Eucalyptus 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 it may stand in direct contact with dry, moist and fatty foodstuffs as far as the pulp grade mentioned above is concerned.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



staatlich 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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