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4 September 2020

Dr. Dr/Hh-har/pf

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

52856 U 20

für
for
pourSuzano S.A.
Av. Brigadeiro Faria Lima 1355
01452-919
São Paulo
BrazilProdukt
Product
Produit

Imperatriz Bleached Eucalyptus Kraft Pulp

The product manufactured by the company mentioned above is a pulp grade which is used for the manufacture of papers and boards for food packaging, of cooking and hot filter papers, of baking papers and boards, of absorber pads as well as of cigarette papers.

It was examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2019 edition), § 176.170,

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

Furthermore, the pulp grade was examined according to the heavy metal contents after

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

and the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008.

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,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 97 der Verordnung vom 19. Juni 2020 (BGBl. I S. 1328), §§ 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 97 of the decree of 19 June 2020 (BGBl. I p. 1328), §§ 30 and 31),

and is approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 222nd Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019),

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 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR Recommendation XXXVI/1. Cooking Papers, Hot Filter Papers and Filter Layers, recasted by 200th Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 222nd Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019),

and the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181st Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 222nd Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019),

as well as to the

BfR-Empfehlung XXXVI/3. Saugeinlagen auf Basis von Cellulosefasern für die Verpackung von Lebensmitteln, 205. Mitteilung, Bundesgesundheitsblatt 45 (2002) 936, zuletzt geändert durch 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR Recommendation XXXVI/3. Absorber Pads based on Cellulosic Fibres for Food Packaging, 205th Announcement, Bundesgesundheitsblatt 45 (2002) 936, last amended by 222nd Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019.

Moreover, the pulp grade is in compliance with the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2019 edition), § 176.170, § 176.180 and § 186.1673.

Papers manufactured with it are in compliance with the

Gesetz zur Umsetzung der Richtlinie über Tabakerzeugnisse und verwandte Erzeugnisse vom 4. April 2016 (BGBl. I S. 569), zuletzt geändert durch Artikel 27 des Gesetzes vom 20. November 2019 (BGBl. I S.1626) § 5,

(Law for the implementation of the Directive concerning tobacco and related products of 4 April 2016 (BGBl. I p. 569), last amendment by article 27 of the act of 20 November 2019 (BGBl. I p. 1626) § 5,

as well as with the

Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse vom 27. April 2016 (BGBl. I S. 980), zuletzt geändert durch Artikel 1 des Verordnung vom 2 Mai 2019 (BGBl. I S.547) § 4,

(Decree concerning tobacco and related products of 27 April 2016 (BGBl. I p. 980), last amendment by article 1 of the act of 2 May 2019 (BGBl. I p. 547) § 4),

as far as the pulp grade is concerned.

For the conformity assessment, the demands of the

Verordnung über Tabakerzeugnisse (Tabakverordnung) vom 20. Dezember 1977 (BGBl. I S. 2831), zuletzt geändert durch Artikel 1 der Verordnung vom 22. Dezember 2014 (BGBl. I S. 2398),

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(Decree on Tobacco Products (Tobacco Decree) of 20 December 1977 (BGBl. I S. 2831), last amendment by article 1 of the Decree of 22 December 2014 (BGBl. I S. 2398),

were used.

Moreover, the pulp grade meets the requirements of the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

regarding the heavy metal contents.

Thus the pulp grade **Imperatriz Bleached Eucalyptus Kraft Pulp** according to the sample material submitted may be used safely for the manufacture of papers and boards for food packaging, of cooking and hot filter papers, of baking papers and boards, of absorber pads 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 5 pages. It was subsequently amended on 26 October 2020.

Certification decision



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

(Dr. Hillmann)
Zugelassene
Lebensmittelchemikerin

The translation of the above stamps is given on page 5.
La traduction des estampilles est donnée en page 5.

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**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.

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.

Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

A file sample of the tested material is kept at the expert's office.

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.