

Melléklet 1



March 19, 2024

1 (5)

Declaration of Compliance

Version: 2024:2

Endura MG Kraft by Stora Enso

Trade name	Endura MG Kraft by Stora Enso (hereafter referred to as the product)
Product description	Enso Endura MG Kraft by Stora Enso – unbleached one – side glazed kraft paper for wrapping, packaging production, used as a base for further converting processes.
Grammage	30 – 100 g/m ²
For more information see technical specification.	
Fiber source	100% fresh fiber
Bleaching	All used pulps are elemental chlorine free (ECF-pulps)
Production site	The product is manufactured at Stora Enso Division Packaging Materials, Ostroleka Mill
Producer	Stora Enso Division Packaging Materials, Ostroleka Mill

Please note that safe and appropriate use in this context means food safety before converting. Any downstream operator in the food value chain is responsible for the suitability and food safety at the intended end-use. For questions regarding end-use (food type and/or conditions) please contact the local Stora Enso sales office for more information.

There might be technical limitations that need to be taken into account and tested separately before use. E.g. product might need additional barrier layer when used in contact with liquids.

Information given in this declaration is based on our current knowledge, written confirmation from our raw material suppliers and/or analysis performed on representative samples based on worst case approach.

Compliance with European food contact legislation

The **product** complies where applicable and under foreseeable conditions of use with

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- BfR Recommendation XXXVI, Paper and board (2023)
- BfR Recommendation XXXVI/2, Paper and board (2023)

This product is intended to be used as wrapping paper and material for other packaging applications and may stand in direct contact with dry, fatty and moist foodstuffs.

Food Contact Guidelines

The *Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles* for food contact provides harmonised approach for self-regulation of paper and board. Stora Enso as a company supports and operates according to the Food Contact Guidelines. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site;

https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines_2019.pdf

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Vat ID 758-00-00-692
Regon 550412627
BDO Registration Number 000002222



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Analyses

Compliance with BfR Recommendation XXXVI and XXXVI/2

The product complies with the requirements in BfR Recommendation XXXVI and XXXVI/2 as follows. Analyses have been performed on representative samples of paperboard.

Heavy metals:

Cadmium (Cd) < 5 µg/l in the cold water extract of the paperboard
Lead (Pb) < 10 µg/l in the cold water extract of the paperboard

Aluminum:

Aluminum (Al) ≤ 1 mg/l in the cold water extract of the paperboard

Formaldehyde:

Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1.0 mg/dm²

Colour fastness:

Analysis has been performed according to EN 646 under test conditions A, B, C, D. There was no visible transfer (grade 5) for any of the test fluids.

Transfer of antimicrobial constituents (Hemmhof test):

Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents. We do not add surface biocides on top of the paperboard.

Slimicides and preservatives:

Required analysis have been performed on representative samples and results are below the limitations set in BfR XXXVI and XXXVI/2 recommendations.

4,4'-Bis(dimethylamino)-benzophenone (Michlers ketone):

Migration of 4,4'-Bis(dimethylamino)-benzophenone is < 0,01mg/kg food.

Benzophenone:

Migration of benzophenone is <0.6 mg/kg food
The migration sum of benzophenone and 4-methybenzophenone is <0.6 mg/kg food

Bisphenol A (BPA):

Migration of BPA is <0.05 mg/kg food

Bisphenol S (BPS):

Migration of BPS is <0.05 mg/kg food

Glyoxal:

Analysis has been performed according to DIN 54603. The amount of glyoxal is < 1.5 mg/dm²

Phthalates:

Analysis has been done for Diethylhexyl phthalate (DEHP), Di-n-butyl phthalate (DBP) and Diisobutyl phthalate (DIBP) according to EN 16453. Migration of DBP and DIBP is <0,3 mg/kg food and migration of DEHP is <1,5 mg/kg food.



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Primary aromatic amines (PAAs):

Analysis has been done according to prEN 17163. Migration of PAAs is < 0,01 mg/kg food.

Other heavy metals

Chromium VI < 0.25 mg/kg

Mercury (Hg) < 0.3 mg/kg

Compliance with Italian food contact legislation

Based on the analysis of representative board samples performed at the Italian laboratory having the aim to ascertain the composition and purity requirements as per Italian Ministry Decree dated 21st of March 1973 and subsequent amendments, Endura MG Kraft by Stora Enso (30 gsm - 100 gsm), regardless of which side, is suitable to come into contact with food products for which migration tests are required and are not required for.

Compliance with US food contact legislation, FDA

Based on the information regarding the formulation, limitations on the used chemical additives as well as the results of the applicable extraction tests we confirm that this product complies with 21 C.F.R. §176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and §176.180 ("Components of paper and paperboard in contact with dry food") and may be used as intended in contact with all food types and under conditions of use E-H as described in tables 1 and 2 of 21 C.F.R. §176.170.

Substances

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that we do not analyze the product for the substances listed below. The information below is based on information given by our chemical suppliers.

Animal origin

We hereby confirm that no additive of animal origin is intentionally added during the manufacturing process of the product. Based on the information received from our chemical suppliers, most of the chemical additives used in the manufacturing of the product are not of animal origin. However, some chemical additives may contain animal origin components. These components are in strict compliance with the requirements of Regulation (EC) 142/2011 as amended including requirements for the processing and purification.

We hereby confirm that substances causing Transmissible Spongiform Encephalopathies (TSEs), including Bovine Spongiform Encephalopathy (BSE) and Creutzfeldt Jacob Disease (CJD), are not intentionally added during the manufacturing of the product.

Based on our current knowledge, this product could qualify with vegan certification criteria.

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CMR substances

Based on information from our suppliers of chemical additives, substances classified as "carcinogenic", "mutagenic" or "toxic for reproduction" in Regulation (EC) 1272/2008 as amended, in concentrations over the legislative limits stated in the material data sheets for our chemical products, are not intentionally added during the manufacturing of the product.

Dual Use Additives

The following substances are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 and according to information from our chemical supplier may be present in the product:

Chemical substance	CAS-number	E number/FL number
Aluminum sulfate	10043-01-3	E-520
Sodium carbonate	207-838-8	E-500
Sodium hydroxide	215-185-5	E-524
Sulphuric acid	7664-93-9	E-513

EN 71-3 Safety of toys – Part 3: Migration of certain elements

We hereby confirm that product, before further converting, complies with the requirements of EN 71-3:2019 + A1:2021 Safety of toys – Part 3: Migration of certain elements.

Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II as amended, the following food allergens or products derived thereof are not intentionally added during the manufacturing of the product:

- Cereals containing gluten and products thereof* (Including Wheat; FALCPA)
- Crustaceans and products thereof (Including Crustacean shellfish; FALCPA)
- Eggs and products thereof
- Fish and products thereof*
- Peanuts and products thereof
- Soybeans and products thereof*
- Milk and products thereof*
- Nuts and products thereof* (Including Tree nuts; FALCPA)
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂.
- Lupin and products thereof
- Molluscs and products thereof

*Please notice the exceptions in Commission Directive 1169/2011/EC, Annex II

Some of the additives used in the manufacturing of the product contain wheat and minor amounts of gluten. According to Commission Regulation (EC) No 828/2014 foodstuffs may be sold as 'gluten-free' if the gluten content does not exceed 20 mg/kg in the food as sold to the final consumer. Based on the worst-case calculations the migration of gluten does not exceed 20 mg/kg food. Worst case calculation is based on the assumption that 1 kg food would be in contact with 6 dm² of product.

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Melléklet 2

ISEGA
Cert GmbH Aschaffenburg

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

20 December 2023
Dr. Dr/Ze-bau

UNBEDENKLICHKEITSERKLÄRUNG CERTIFICATE OF COMPLIANCE CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

61089 U 23

für
for
pour

Mondi Štětí a.s.
Litoměřická 272
411 08 Štětí
Czech Republic

Produkt
Product
Produit

Advantage MG White High Gloss
Advantage MG White Flex
Advantage MG White Flex Plus
Advantage MG White Flex C
Advantage MG White Flex RB

The products manufactured by the company mentioned above are bleached paper grades in different grammages which are used for food packaging.

They were examined by us in consideration of 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),

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as well as according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2023 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.

Moreover, an analysis in line with the

DGCCRF - Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des maté-
riaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées
alimentaires,

(DGCCRF - MCDA Blatt Nr. 4 (V02 - 01/01/2019) Food contact suitability of plant fibre-
based organic materials intended to come into contact with food),

was carried out.

In addition, the

Schweizerische Lebensmittelbuch, Kapitel 47A „Materialien aus Papier, Karton und Pappe
für Lebensmittel,

(Swiss Food Code, chapter 47A "Materials made of paper and board for food"),

has still been consulted as a basis for the analyses and a sensory test was performed.

Besides, they were tested for the content of heavy metals according to 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 according to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of
CONEG of December 14, 1989, last modified February 2021.

The paper 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 Direc-
tives 80/590/EEC and 89/109/EEC, Official Journal of the European Union L 338/4 of
13.11.2004, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019,
Official Journal of the European Union L 231/1 of 6 September 2019, article 3,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Fut-
termittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021
(BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 2 Absatz 6 des Gesetzes vom
20. Dezember 2022 (BGBl. I S. 2752), §§ 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; 2022 I p.28), last amended by article 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 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 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

The marketability in Italy is given by the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last amended on 25 November 2022.

Moreover, they conform to the French

Décret n° 2007-766 du 10 mai 2007 portant application du code de la consommation en ce qui concerne les matériaux et les objets destinés à entrer en contact avec les denrées alimentaires, Journal officiel de la République française n° 0109 du 11 mai 2007, modifié en dernier lieu par décret n° 2011-385 du 11 avril 2011, Journal officiel de la République française n° 0087 du 13 avril 2011,

(Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer code, which concerns materials and articles intended to come into contact with food, Official Journal of the French Republic no. 0109 of 11 May 2007, last modified by Decree no. 2011-385 of 11 April 2011, Official Journal of the French Republic no. 0087 of 13 April 2011),

and fulfil the requirements of the

DGCCRF - Fiche MCDA n°4 (V02 - 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(DGCCRF - MCDA Blatt Nr. 4 (V02 - 01/01/2019) Food contact suitability of plant fibre-based organic materials intended to come into contact with food),

Additionally, the bleached paper grades meet the provisions of the Swiss

SR 817.0 Bundesgesetz über Lebensmittel und Gebrauchsgegenstände (Lebensmittelgesetz - LMG) vom 20. Juni 2014 (AS 2017 249), Stand am 1. Januar 2022, Artikel 15,

(SR 817.0 Federal Act on Foodstuffs and Utility Articles (Foodstuffs Act - FSA) of 20 June 2014 (AS 2017 249), status as of 1 January 2022, article 15,

as well as of the

SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) vom 16. Dezember 2016 (AS 2017 283), Stand am 15. Juli 2022 (AS 2022 396), Artikel 49,

(RS 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (AS 2017 283), status as of 15 July 2022 (AS 2022 396), article 49.

Furthermore they are in compliance with the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2023 edition), §§ 176.170 and 176.180.

Regarding the content of heavy metals, they furthermore observe 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 the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified February 2021.

Thus, the bleached paper grades **Advantage MG White High Gloss**, **Advantage MG White Flex**, **Advantage MG White Flex Plus**, **Advantage MG White Flex C** and **Advantage MG White Flex RB** in different grammages according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, moist and fatty foods.

This certificate of compliance has a validity of 2 years and consists of 5 pages.

Certification decision



staatlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Kunststoffen, Glas, Metallblech und
sonstigen Metallverpackungen auf ihre
unbedenkliche Unbedenklichkeit

(Dr. Zechmann)
Officially certified
and authorized food
chemist

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



**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 Chamber of Industry and Commerce.

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

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.
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