

Declaration of Compliance

Version: 2020:3

Ensocoat 2S™

<i>Trade name</i>	Ensocoat 2S (hereafter referred to as the paperboard)
<i>Product description</i>	Two side fully coated multilayer SBS board
<i>Product code</i>	KP273
<i>Grammage</i>	Ranges between 220 g/m ² to 400 g/m ² For more information see technical specification.
<i>Fiber source</i>	Fresh and virgin fiber
<i>Bleaching</i>	All used pulps are elemental chlorine free (ECF-pulps)
<i>Production site</i>	Ensocoat 2S is manufactured at Stora Enso Division Packaging Materials, Imatra Mills
<i>Producer</i>	Stora Enso Division Packaging Materials, Imatra Mills

Please note that safe and appropriate use in this context means food safety. There might be technical limitations that the converter and any operator in the food value chain needs to take into account and test separately before use.

When converting this paperboard each part of the converting chain is responsible for the suitability and food safety at the intended end-use.

For questions regarding if a specific end-use (food type and/or conditions) is not covered by this declaration please contact the local Stora Enso sales office for more information.

Compliance with European food contact legislation

Information given in this declaration is based on our current knowledge and written confirmation from our chemical suppliers as well as analysis performed on representative paperboard samples.

For the purpose to achieve high chemical and microbiological purity only fresh and virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

We hereby declare that this paperboard before converting complies where applicable and under foreseeable conditions of use with the requirements of **Regulation (EC) No 1935/2004** on materials and articles intended to come into contact with food as well as **BfR Recommendation XXXVI** on paper and board for food contact (2019). This paperboard is produced in accordance with **Commission Regulation (EC) No 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food.

This paperboard is intended for packing food and may stand in direct contact with dry and fatty foodstuffs.

This paperboard is intended for use under the following conditions of temperature and time.

- Freezer/fridge
- Room temperature (up to 40°C for more than 24 hrs)

This paperboard is not intended for use under the following conditions and temperatures.

- Hot-fill
- De-freezing and/or re-heating of food (e.g. ready meals) in microwave oven**

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- Conventional oven

Please also see storage conditions.

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 Guideline. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site;
<http://www.cepi.org/mediacentre/publications>

Analyses

Compliance with BfR Recommendation XXXVI

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

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
Aluminium (Al) ≤ 2 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 mg/dm².

Optical brightening agents:

Optical brightening agents, OBAs, are used in the production of paperboard. Analysis has been performed according to EN 648 under test conditions A. There was no visible transfer (grade 5) with olive oil simulant

Colour fastness: Analysis has been performed according to EN 646. Analysis has been performed according to EN 646 under test conditions A. There was no visible transfer (grade 5) for any of the test fluids.

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.

Other heavy metals

Chromium VI < 0,25 mg/kg
Mercury (Hg) < 0,3 mg/kg

Nickel < 2,0 mg/dm² as required in Finnish KTM decree 268/1992
Chromium < 2,0 mg/dm² as required in Finnish KTM decree 268/1992
Lead < 0,50 mg/dm² as required in Finnish KTM decree 268/1992
Cadmium < 0,10 mg/dm² as required in Finnish KTM decree 268/1992



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Dioxins

The content of 17 2,3,7,8-substituted toxic congeners of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) and 12 dioxin like PCB's analysed in representative samples is less than 1 ppt WHO-TEQ.

PCB

Analyses have been performed on representative paperboard samples for polychlorinated biphenyls (PCB) according to EN ISO 15318. The amount of PCB is below < 2.0 mg/kg.

PCP

Analysis has been performed on representative paperboard sample for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP is < 0.1 mg/kg.

Compliance with US food contact legislation, FDA

Information given in this declaration is based on our current knowledge and written confirmation from our chemical suppliers as well as analysis performed on representative paperboard samples.

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 paperboard 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 the food types V, VII A, VIII and IX under the conditions of use E, F and G as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this paperboard is compliant as food packaging material used in contact with infant formula or human milk only with a proper functional barrier.

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 paperboard for the substances listed below. Information below is based on information given by our chemical suppliers.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the production paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination**.

* http://ec.europa.eu/food/food/biotechnology/index_en.htm

** Regulation 1830/2003 on traceability and labeling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

Animal origin

We hereby confirm that no additive of animal origin is intentionally added in the production of paperboard.



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We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and Creutzfeldt Jakob Disease, CJD is intentionally added in the production of paperboard.

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

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, the following food allergens or products derived thereof are not intentionally added for the manufacture of paperboard:

- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof*
- Peanuts and products thereof
- Soybeans and products thereof*
- Milk and products thereof*
- Nuts and products thereof*
- 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*

Wheat and/or barley starches used in the production of paperboard contain minor amounts of gluten. According to Commission Regulation (EC) No 41/2009 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 gluten content of paperboard does not exceed 20 mg/kg and thus paperboard is also considered as "gluten-free".

Other substances

We hereby confirm that the following substances are not intentionally added in the production of paperboard.

- Bisphenol A (BPA)
- Phthalates
- Titanium dioxide (TiO₂)

Additional legislation and regulations, not food related

Packaging and Packaging Waste Directive

The **paperboard** complies with the Packaging and Packaging Waste directive 94/62/EC as amended.

- The sum of lead, cadmium, mercury and hexavalent chromium in the paperboard is less than 100 ppm (EN 13428).

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- The level of substances hazardous* to the environment in the paperboard is less than 0,1% (EN 13428).

** Requirements for classification of substances or preparations dangerous to the environment and assigned the hazard statements H400, H410 and H411 according to the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).*

The paperboard is suitable for recovery by ;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)
- Composting and biodegradation in industrial conditions (EN 13432) and in ambient conditions, licensee number S0249*: <http://okcompost.be/en/certified-products/>

Note: A material being recoverable by a certain method does not guarantee that the finished packaging can be recovered using this method

** A finished product made of an OK compost (or equal certification scheme) certified intermediate material like the Ensocoat 2S does not automatically comply with the requirements of the compost test program. Because of the other unknown components that can be added to the finished product (ink, reinforcement path, glue etc.), this **finished product** needs to be submitted to compost certification in order to have the permission to put the compost mark on this finished product.
the compost mark on this finished product*

REACH Regulation (EC) 1907/2006.

We continuously monitor the development of the Candidate List of Substances of Very High Concern, the substances for authorization as well as any restrictions applicable to our use. To our knowledge and based on the information from our suppliers today we can confirm that none of our articles contains substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorisation) in a concentration above 0.1% (w/w).

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

We hereby confirm that paperboard/paper, before further converting, comply with the requirements of EN 71-3:2019 Safety of toys – Part 3: Migration of certain elements.

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, in concentrations over the legislative limits stated in the material data sheets for our chemical products, are not used as raw material and are not intentionally added in the production of paperboard.

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 this information is based on the information gained from our suppliers, and we do not routinely test our products against these substances.

Certified management systems at the production site/sites

Certificates are available on the internet: <https://www.storaenso.com/en/download-centre?d=1&t=1>



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Paperboard production

ISO 9001
ISO 14001
ISO 22000
FSC 22000
ISO 45001
ISO 50001
FSC® CoC
PEFC CoC

FSC® trademark license code: FSC®-C105192 PEFC™ logo license registration number: PEFC/02-31-71

Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 50-55 % relative humidity and 20-23° C. We recommend converting of the paperboard within 12 months from manufacturing date and after this time rights of claims normally disappear.

For more information regarding the shelf life of the board please contact the local Stora Enso sales office.

Imatra, 23 December 2020

Stora Enso Division Packaging Solutions
Imatra Mills

Aino Nurmi
Product Safety Manager

Disclaimer

It is the responsibility of the manufacturer of the finished articles to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application. This declaration and its contents are subject to the following additional limitations and disclaimers:

- *Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.*
- *This declaration is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.*



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- *This declaration is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- *Nothing in this declaration shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose, (c) the use, or the suitability for use, in connection with other products or materials, or (d) the safety or legality in any use, processing and handling of our products.*
- *This declaration forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this declaration.*
- *No one other than the addressee may rely on this declaration and we assume no liability whatsoever to any third party*