

## Sappi Europe

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## Declaration of Compliance

Product Name: Parade Label Pro

Product Description: Coated Speciality paper

### 1. General Information

#### Pulp composition

*Parade Label Pro* is produced with a mixture of elementary and totally chlorine free bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that *Parade Label Pro* is produced without intentional addition of any recycled materials.

#### Storing and handling recommendations

Under appropriate storage conditions the functionality of *Parade Label Pro* is guaranteed for 12 months after supply. Appropriate storage conditions are defined as storage of the supplied reels and sheets in original packaging protected against direct sun light at an average climate ( $\pm 10\%$ ) of 23°C, 50 % rel. humidity. Especially high storage temperatures, high ambient humidity and direct UV radiation should be avoided. In case of differences between storage climate and the ambient conditions during conversion the reels and sheets must be stored at least 24 h in original packaging, preferably 48 h near the conversion machine to make sure that the reels and sheets adopt the ambient temperature. This also holds for paper reels just supplied because temperature differences over the web width and running length might negatively affect the conversion process. To avoid the buildup of rope marks and creases, as well as flatness deviations (in case of sheets) by moisture exchange with the environment, the original packaging, especially under humid climate conditions, should only be removed immediately before conversion. Also opened reels have to be appropriately repacked with a moisture barrier packaging.

#### Producing mill

*Parade Label Pro* is produced at Gratkorn mill.

### 2. Food Contact Status

#### Conditions for food contact

*Parade Label Pro* has been assessed by an accredited laboratory for food contact suitability. According to the food contact certificate issued by the laboratory, it can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry and fatty foodstuff.

#### Compliance with (EU) No 1935/2004

*Parade Label Pro* has been assessed by an accredited laboratory and found to be in compliance with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. *Parade Label Pro* can be applied as packaging for foodstuffs, as indicated on the food contact certificate issued by the accredited laboratory.

#### Compliance with (EC) No 2023/2006

*Parade Label Pro* was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. Full traceability of raw materials is possible through the IT systems. The

producing mill has implemented a quality management system according to ISO 9001. The quality management system is externally certified.

#### Compliance with BfR recommendation XXXVI

*Parade Label Pro* has been found to be in compliance with the requirements set in **Bundesinstitut für Risikobewertung (BfR) Recommendation XXXVI**. „*Papier, Kartons und Pappen für den Lebensmittelkontakt*“ (*Paper and board for food contact*).

#### Compliance with Foodstuffs and Animal Feed Code (LFGB)

*Parade Label Pro* is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

#### Compliance with Italian legislation DM 21.3.73

*Parade Label Pro* is in compliance with the current version of the Ministerial Decree of 21 March 1973.

#### French regulation Fiche MCDA n°4 (V02 – 01/01/2019)

The above mentioned product has not been assessed for compliance in regard to the French regulation Fiche MCDA n°4 (V02 – 01/01/2019), or any French legislation.

### 3. Toy Safety

#### Toy safety EN 71/3

*Parade Label Pro* has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3: "Migration of certain elements".

### 4. Relevant legislation

#### Compliance with EC 1907/2006 (REACH)

EC 1907/2006 (REACH) primarily addresses chemical substances and preparations. From the perspective of REACH paper is considered as an article. Registration or notification requirements only apply for articles if the certain criteria are met. This is not the case for above mentioned product, that is why registration or notification requirements under REACH cannot be applied. None of the substances listed in the ECHA Candidate List of Substances of Very High Concern, updated on 4th of February 2026, are intentionally used in the formulation or during the manufacturing process of above mentioned product in a content > 0,1%. We further confirm the compliance with Article 33 of EC 1907/2006 about the duty to communicate information on substances in articles.

#### Compliance with Regulation (EU) 2025/40

*Parade Label Pro* is in compliance with the Regulation (EU) 2025/40, including latest amendments, regarding the content of heavy metals as specified in Article 5. The sum of the heavy metals Cr(VI), Pb, Cd, Hg is below 100 ppm.

#### CONEG

*Parade Label Pro* is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals Cr(VI), Pb, Cd, Hg is below 100 ppm.

#### Compliance with (EU) 528/2012 (Biocides)

The preservation agents used in the production of *Parade Label Pro* (e.g. in pigment slurries) comply with the Regulation (EU) 528/2012, including amendments and are used in accordance with XXXVI. recommendation of the BfR. No special biocide treatment is applied to the above mentioned product to give it an antimicrobial effect, it is therefore not a 'treated article' in sense of the Regulation (EU) 528/2012. *Parade Label Pro* does not have an effect on the growth of microorganisms which is proven by a negative Hemmhof test based on DIN EN 1104.

#### Compliance with (EC) No 1223/2009 (Cosmetics)

During the production of this grade, none of the substances listed in Annex III of Regulation EG 1223/2009 is intentionally added. With respect to Annex II, certain listed substances might be added in traces. Further information is confidential.

## Compliance with Directive 2011/65/EU (RoHS)

The EU-directive 2011/65/EC on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 are not applicable to *Parade Label Pro*.

## Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of the above mentioned product. Updates until and including December 5th, 2025 have been considered.

## 5. Miscellaneous

### Halal/Kosher

The presence of traces of substances of animal origin in *Parade Label Pro* cannot be fully excluded. Neither *Parade Label Pro* nor the producing mills have been assessed or certified as Kosher or Halal.

## 6. Information on end-of-life scenarios

### Recyclability

The above mentioned product is fully recyclable in the waste paper stream. *Parade Label Pro* has not been tested for its repulpability properties, but to the best of our knowledge about *Parade Label Pro* composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 22 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

### Biodegradability

The above mentioned product has not been tested on biodegradability or compostability. Based on knowledge on product composition and raw materials, we do not see significant restrictions in its biodegradability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes. Due to its alkali properties the paper would even improve compost as it buffers soil acidification, a common challenge in agriculture. Our papers do contain fossil polymer binders. Information on product composition is available on Paper Profiles. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

## 7. Non-use and use of specific substances or materials

### MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

### Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of *Parade Label Pro*, except for wheat starch, which in turn may contain gluten. Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

### PFAS

Per- and polyfluoroalkyl substances (PFAS), defined as substances that contain at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I atom attached to it), have not been intentionally added to the manufacturing process of *Parade Label Pro*. These substances are not part of *Parade Label Pro* formulation.

### Persistent organic pollutants

None of the following substances listed in the annexes of the Stockholm Convention (last updated 2025) have been intentionally added during production of this product:

**Annex A (Elimination)**

- Aldrin
- Chlordane
- Chlordecone
- Chlorpyrifos
- Decabromodiphenyl ether (commercial mixture, c-decaBDE)
- Dechlorane Plus
- Dicofol
- Dieldrin
- Endrin
- Heptachlor
- Hexabromobiphenyl
- Hexabromocyclododecane (HBCDD)
- Hexabromodiphenyl ether and heptabromodiphenyl ether
- Hexachlorobenzene (HCB)
- Hexachlorobutadiene (HCBd)
- Alpha hexachlorocyclohexane
- Beta hexachlorocyclohexane
- Lindane
- Long-chain perfluorocarboxylic acids, their salts and related compounds
- Medium-chain chlorinated paraffins (MCCPs)
- Methoxychlor
- Mirex
- Pentachlorobenzene
- Pentachlorophenol and its salts and esters
- Polychlorinated biphenyls (PCBs)
- Polychlorinated naphthalenes
- Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds
- Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds
- Short-chain chlorinated paraffins (SCCPs)
- Technical endosulfan and its related isomers
- Tetrabromodiphenyl ether and pentabromodiphenyl ether
- Toxaphene
- UV-328

**Annex B (Restriction)**

- DDT
- Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOSF)

**Annex C (Unintentional production)**

- Hexachlorobenzene (HCB)
- Hexachlorobutadiene
- Pentachlorobenzene
- Polychlorinated biphenyls (PCBs)
- Polychlorinated dibenzo-*p*-dioxins (PCDD)
- Polychlorinated dibenzofurans (PCDF)
- Polychlorinated naphthalenes

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of *Parade Label Pro*. The amendments up to and including 22th July 2024 (EU) 2024/2570 have been considered.

**Optical brightening agents**

Optical brightening agents (OBAs) are intentionally used during the manufacture of *Parade Label Pro*. These substances are used in accordance with respective BfR recommendations and FDA legislation.

## CMR Substances according to CLP legislation

During the production of *Parade Label Pro*, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

### SIN List

None of the substances on the SIN list developed by the non-profit organisation ChemSec are intentionally added during manufacture or known to be present in the raw materials of *Parade Label Pro*, with the exception of the biocide Glutaral (CAS No 111-30-8). However, this substance has not been detected in the final product, nor do our papers have any biocidal properties. This is most likely due to degradation in the process conditions of the drying section where the paper product is exposed to high temperatures.

Amendments up to and including January 2023 have been taken into account.

### Flame retardants

No flame retardants have been added to the manufacturing process of *Parade Label Pro*. We can confirm non-use of the following substances commonly used as flame retardants:

- Antimony trioxide CAS (1309-64-4)
- TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
- TBB, 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
- Chlorinated paraffins CAS (108171-26-2)
- TCPP, Tris(1-chloro-2-propyl) phosphate CAS (13674-84-5)
- HBCD, Hexabromocyclododecane CAS (3194-55-6)
- TBBPA, Tetrabromobisphenol A CAS (79-94-7)
- TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
- TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
- Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
- Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
- Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

### TSCA Section 6

No substances listed under Section 6 of the US Toxic Substances Control Act have been intentionally added to the manufacturing process of *Parade Label Pro* and they are not expected to be present. At the time of the assessment the following persistent, bioaccumulative, and toxic chemical substances have been listed:

- PIP (3:1) - phenol, isopropylated phosphate (3:1) (CAS 68937-41-7)
- DecaBDE - decabromodiphenyl ether (CAS 1163-19-5)
- HCBd - hexachlorobutadiene (CAS 87-68-3)
- PCTP - pentachlorothiophenol (CAS 133-49-3)
- TTBP - 2,4,6-tris(tert-butyl)phenol (CAS 732-26-3)

### Endocrine disruptors

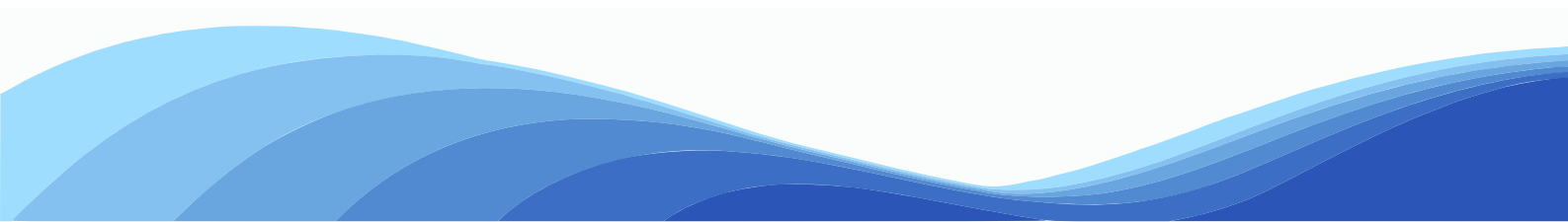
None of the substances listed in the lists I and III of the website <https://edlists.org/>, administered by The Danish Environmental Protection Agency, are intentionally added during production of *Parade Label Pro*, except for 2,2-dibromo-2-cyanoacetamide (DBNPA), CAS-No 10222-01-2, which is added as a biocide. It is not detected in the final paper.

### Styrene

Styrene (CAS-No 100-42-5) has not been intentionally added during production. Used raw materials might contain styrene as impurity, therefore a presence of styrene traces in the paper product cannot be fully excluded.

### Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of *Parade Label Pro*:

- Acetone (CAS 67-64-1)
  - Alkylphenols and their ethoxylates
  - Anthraquinone (CAS 84-65-1)
  - Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
  - Asbestos
  - Azodicarbonamide (CAS 123-77-3)
  - BAC (CAS 63449-41-2 )
  - BADGE, BFDGE, NOGE
  - Benzene (CAS 71-43-2 )
  - Benzophenones
  - Benzyl alcohol (CAS 100-51-6)
  - Bisphenols
  - Cadmium, lead, mercury, chromium and compounds thereof
  - Chlorine and other halogens (Fluorine, Bromine, Iodine)
  - Cholecalciferol (CAS 67-97-0)
  - Cobalt and its compounds
  - Creosote
  - Cyanuric acid (CAS 108-80-5 )
  - DDAC (CAS 7173-51-5 )
  - Diisopropylnaphtalenes (DIPNs)
  - Dimethylfumarate (CAS 624-49-7)
  - Dioxane (CAS 123-91-1)
  - Disodium guanylate (CAS 5550-12-9)
  - Epoxy resins
  - Ethanol (CAS 64-17-5)
  - Ethylene oxide (75-21-8)
  - Formaldehyde
  - Glyphosate (CAS 107-83-6)
  - Glycol ethers
  - GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
  - Hexane (CAS 110-54-3)
  - Inosinate (CAS 4691-65-0)
  - Isobornyl Acrylate (CAS 5888-33-5)
  - Isopropyl alcohol (IPA) (CAS 67-63-0)
  - Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
  - Mancozeb (CAS 8018-01-7)
  - Melamine (CAS 108-78-1)
  - Micas
  - Monosodium glutamate (CAS 142-47-2)
  - Natural rubber latex materials
  - N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
  - Nitrosamines, Nitrites, Nitrates
  - Nitrocellulose
  - N-Methylpyrrolidone (NMP) (CAS 872-50-4)
  - 4-Nonylphenol (4-NP) (CAS 3050-88-2)
  - Nonylphenoethoxylate (NPE, CAS 127087-87-0)
  - Organic Peroxides
  - Organotin compounds
  - Orthophenylphenol (CAS 90-43-7)
  - Partially hydrogenated terphenyls (HTPs)
  - Pentachlorophenol (PCP)
  - Pentanedione-2,4-titanium
  - Perchlorates
  - Pesticides and Fungicides
  - Phenylalanin, Phenylamine
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- Phthalates
- Polybrominated biphenyls
- Polycyclic aromatic hydrocarbons (PAHs)
- Polyvinylchloride (PVC)
- Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
- Radioactive materials, radioactive contamination
- Rayon
- Resorcinol (CAS No. 108-46-3)
- Rice plant derived substances
- Seed-bearing parts of a flowering plant (fruits)
- Sodium Antimonate A (CAS 15432-85-6)
- TAA Titanium Acetylacetonate (CAS 17501-79-0)
- Thiuram (CAS 137-26-8)
- Toluene (CAS 108-88-3 )
- Triclosan (CAS 3380-34-5)
- Tris(4-nonylphenyl, branched and linear) phosphite
- 2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
- Vinyl chloride (CAS 75-01-4)
- Volatile Organic Compounds
- Yeast
- TNPP, 4 NP and NPE

## Bisphenols

We confirm, that Bisphenol A (CAS-No. 80-05-7), as well as other bisphenols and bisphenol derivatives are not intentionally added during the production of our paper grades. Considering articles 3 and 4 of Regulation 2024/3190/EC, we therefore consider *Parade Label Pro* compliant with the regulation.

## 8. Disclaimer

### Disclaimer

This declaration is restricted to the above mentioned product in the state it is delivered by us. This information provided in this statement applies only for the above mentioned product and may not substitute necessary end use testing. Sappi shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of *Parade Label Pro* for a particular application or end use. The information given in this statement has been verified by Sappi at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available. Republishing this document is not permitted.