

Declaration of Compliance

Issued by:

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(hereinafter 'Mondi')

To:

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Italy

This document constitutes the declaration of compliance and contains the appropriate information to demonstrate compliance with the hereinafter Regulation(s). The data provided herein shall be used by the recipient to establish its own declaration of compliance for products from subsequent stages of manufacturing or for the final article, if required by the applicable laws. The recipient shall not forward this document as such to third parties. Any detailed test results, calculations, or other technical data provided separately constitute supporting documentation and shall be treated as confidential, to be made available only to national competent authorities on request.

Paper grade

BIO TOP 3® next, not laminated, only folio formats and reels (hereafter 'paper')

Composition

The 'paper' delivered by 'Mondi' is a 100% pure virgin fiber paper grade and no post-consumer or post-industrial recycled materials are included.

Description of Application

The 'paper' can be used safely for food packaging application of the following foodstuffs:

Name	Market
direct contact with dry, non-fatty foodstuffs	EU

Regulations and Guidelines

We confirm that the 'paper' complies with the requirements of the following regulations, directives and recommendations:

Regulation Nr	Name	Issue Date	Description	Country
Regulation				
(EC) No 1907/2006	Regulation (EC) No 1907/2006 - 18.12.2006	2006-12-18	REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)	EU
(EC) No 1935/2004	Regulation (EC) No 1935/2004 - 27.10.2004	2004-10-27	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	EU
(EC) No 2023/2006	Regulation (EC) No 2023/2006 - 22.12.2006	2006-12-22	COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice (GMP) for materials and articles intended to come into contact with foods	EU
Standard				
EN 71-3:2019+A2:2024 (DIN EN 71-3:2025-02)	Standard EN 71-3:2019+A2:2024 (DIN EN 71-3:2025-02) - 14.04.2021	2021-04-14	Safety of toys - Part 3: Migration of certain elements	EU
Recommendation				
XXXVI/BfR (2025)	Recommendation XXXVI/BfR (2025) - 01.10.2025	2025-10-01	Paper and board for food contact	DE

Decreto Ministeriale 21 marzo 1973

The marketability in Italy is given by the Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.04.1973, art. 38-bis, last amended on 14 November 2019.

Statements regarding Regulations and Guidelines

Regulation (EC) 1935/2004 - on materials and articles to come into contact with food

Due to missing European legal documents (specific measure) for paper and board based food contact materials, the compliance of the 'paper' is given by fulfilling the requirements of the German Recommendation XXXVI for the given application - please see 'Description of Application'.

Regulation (EC) 2023/2006 - on good manufacturing practise for materials and articles intended to come into contact with food

Regulation (EC) 1907/2006 - concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

The 'paper' produced by 'Mondi' is regarded as 'article' and no REACH registration is needed. All suppliers of chemical products to 'Mondi' have confirmed their obligation of information towards 'Mondi' in case of any REACH relevant changes in their product composition. 'Mondi' confirms to fulfil its obligations of immediately informing your company on all REACH relevant changes on the produced product according to Reg (EC) 1907/2006, article 33. This duty on information includes also compliance with the limit values of less than 0.1 weight percent for substances listed in the ECHA Candidate List of Substances of Very High Concern (SVHC list) as last amended.

Reg(EU) 2025/40 - on packaging and packaging waste (PPWR)

Heavy Metals

The 'paper' produced by 'Mondi' fulfils the requirements of heavy metals (the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging and packaging components shall not exceed 100 ppm by weight) of the PPWR.

Per- and polyfluorinated alkyl substances (PFAS)

PFAS, a substance group of more than 10.000 different compounds, are widely used in numerous industrial processes and consumer products due to their special technical properties.

On Dec 19th 2024 the European Commission has signed-off the PPWR proposal, which has been published on Jan 22nd 2025 and shall apply from Aug 12th 2026 (except Article 67(5) shall apply from Feb 12th 2029). According to Article 5(5) food contact packaging shall not be placed on the market if it contains PFAS in a concentration equal or above the following limits:

- 25 ppb (parts per billion) for any individual PFAS compound measured using targeted analysis (polymeric PFAS excluded from quantification)
- 250 ppb for the sum of PFAS compounds measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification)
- 50 ppm (parts per million) for total fluorine originating from PFAS sources (including polymeric PFAS)

On Mar 30th 2026, the guidance document 'Approval of the draft Commission Notice on the Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste' was officially published. This document specifies that PFAS compliance is assessed using a stepwise approach, including the determination of total fluorine (TF) and/or organic fluorine as initial screening parameters. Materials and articles with levels below the threshold of 50 ppm are considered compliant with the PFAS restriction requirements of the PPWR.

With reference to this guidance, we confirm that the 'paper' fulfils the fluorine criteria of the PPWR, as determined using appropriate analytical methods.

German Recommendation XXXVI - on paper and board for food contact (BfR)

The 'paper' may be used safely for the given application - please see 'Description of application'.

Comment - The BfR Rec XXXVI limits the contact of paper or paperboard to temperatures up to 90°C. For special applications (e.g. higher temperature range) the respective special recommendation (e.g. BfR Rec XXXVI/1, XXXVI/2) has to be verified.

Restricted Substances

The given limits of all paper significant restricted substances listed in the German Recommendation XXXVI are fulfilled for the given application/s - please see 'Description of application'.

Dual Use Substances

Name	CAS	FCM	E-No
CALCIUM CARBONATE	0000471-34-1	21	E 170
CALCIUM CHLORIDE	0010043-52-4	585	E 509
CELLULOSE	0009004-34-6	553	E 460 II
HYDROCHLORIC ACID	0007647-01-0	507	E 507
QUARTZ	0014808-60-7	616	E 551
SILICON DIOXIDE	0007631-86-9	504	E 551
SODIUM BISULPHITE	0007631-90-5	505	E 222
SODIUM HYDROXIDE	0001310-73-2	400	E 524
SORBITAN MONOOLEATE	0001338-43-8	416	E 494
SULPHURIC ACID	0007664-93-9	511	E 513

Limitations

The use of the 'paper' is verified to be compliant for the applications listed in 'Description of application', for other applications please get in contact with Mondi.

Disclaimer

We recommend to store the paper under following conditions: Temperature 23°C (+/- 2°C) and relative humidity 50% (+/-10%). The paper should be stored in its original, undamaged wrapping and in a dry area without direct sunlight. Before unwrapping, the paper should be conditioned in the production environment for at least 12 hours. After unwrapping, we recommend to store the paper in an ideal climate with a relative humidity of 50% at a regulated room temperature of 23°C.

Issued on 20.05.2026

A handwritten signature in grey ink, appearing to read "Thiel Michelle".

Created by Michelle Thiel

This statement is valid until 31/12/2026. It replaces all previous versions and remains valid until expired or replaced by a newer version.