



EXACOMPTA SAS
138 quai de Jemmapes – BP 66
75461 – Paris cedex 10
France

Attestation of compliance with European food contact legislation

Exacompta SAS hereby declare that Exacompta cardboard cups and plates are in compliance with European food contact legislation.

Information given in this declaration is based on our current knowledge and written confirmation from our suppliers as well as analysis performed by our suppliers on representative product 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 manufacturing of product. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

Exacompta hereby declare that this products comply 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 (2022). These products are 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.

Company

EXACOMPTA SAS

Name & title :

Mrs Caroline TAMPONNET – CSR and Certifications Manager

Date & signature:

26 / 06 / 2024

EXACOMPTA
S.A.S. au capital de 2.160.000 €
138 quai de Jemmapes
75010 PARIS
SIRET 702 047 564 00068

Annex : suppliers attestations

Document : 17 pages



storaenso

November 1, 2022

1 (0)

Declaration of Compliance

Version: 2022:2

Cupforma Natura Aqua+™

Trade name	Cupforma Natura Aqua+ (hereafter referred to as the product)
Product description	Bleached cup board with dispersion barrier on one side or on both sides of the paperboard
Product code	DP102 and DP104
Grammage	199 g/m ² to 350 g/m ² For more information see technical specification.
Fiber source	Fresh and virgin fiber
Bleaching	All used pulps are elemental chlorine free (ECF-pulps)
Production site	Cupforma Natura Aqua+ is manufactured at Stora Enso Division Packaging Materials, Imatra Mills
Producer	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 any downstream operator in the food value chain needs to take into account and test separately before use. E.g. product might need additional barrier layer when used in contact with liquids.

Any downstream operator in the food value 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 product 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 manufacturing of product. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

We hereby declare that this product 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 (2022). This product is 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.

This product is intended in direct contact for use under the following conditions of temperature and time with following food types.

- Room temperature or below (up to 40°C for up to 12 hrs) for aqueous, acidic and low alcoholic foodstuffs such as coffee, tea, soft drinks as well as ice cream
- Room temperature or below (up to 40 °C for up to 24 hrs) for fatty foodstuffs
- Room temperature or below (up to 40 °C for more than 24 hrs) for dry foodstuffs such as coffee powder
- Hot-fill for aqueous, acidic and low alcoholic foodstuffs, such as coffee and tea.
- Frozen for dry, moist, acidic, low alcoholic and fatty foodstuffs

Stora Enso
Division Packaging Materials
Imatra Mills
FI-50600 Imatra, Finland
Tel +358 2048 111
www.storaenso.com

Legal information
Stora Enso Oyj
Domicile: Helsinki
VAT no: FI10390503
Business ID: 103905-0



November 1, 2022

2 (6)

Declaration of Compliance

Version: 2022:2

* It is the responsibility of the packer of the finished articles to ensure that the article is safe to use in the intended conditions.
"Hot-fill" means the filling of any article with a food with a temperature not exceeding 100 °C at the moment of filling, after which the food cools down to 50 °C or below within 60 minutes, or to 30 °C or below within 150 minutes.

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:

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

Analyses

Compliance with BfR Recommendation XXXVI

The product complies with the requirements in BfR Recommendation XXXVI 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

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

Chloropropanols

1,3-DCP (1,3-dichloro-2-propanol) < 2 µg/l in the cold water extract of the paperboard
3-MCPD (3-monochloropropane diol) < 12 µg/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.

Optical brightening agents:

Optical brightening agents, OBAs, are not used as raw material or intentionally added in the manufacturing of paperboard. Analysis has been performed according to EN 648 under test conditions A. There was no visible transfer (grade 5) for any of the test fluids.

Colour fastness: 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.

(Hermhof 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.

Biocides are analysed on representative samples and results are below the limitations set in BfR recommendations.



storaenso

November 1, 2022

3 (8)

Declaration of Compliance

Version: 2022:2

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 product 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 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 the food types I, II, VI-A, VI-B, VI-C, VII-B and VIII and under conditions of use C-G as described in tables 1 and 2 of 21 C.F.R. §176.170.

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

* The term "infant" refers to individuals aged 0- 6 months and "infant food" is limited to infant formula and human milk. For more information please check with FDA Guidance on "Preparation of Food Contact Notifications for Food Contact Substances in Contact with Infant Formula and/or Human Milk": <https://www.fda.gov/media/124714/download>

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. 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.

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 process of the product.

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

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 process 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 in concentrations over 10 µg/kg foodstuff*.



sloraenso

November 1, 2022

4 (0)

Declaration of Compliance

Version: 2022:2

Chemical substance	CAS-number	E number/FL number
Propylene glycol	57-55-6	E15200
Polyethylene glycol	25322-68-3	E1521
Hexamethylenetetramine	1336-21-6	E239
Sodium nitrate	7631-99-4	E251
Sodium acetate	127-09-3	E262
Erythorbic acid	89-65-6	E315
Sorbitan monostearate	1338-41-6	E491
Sodium sulphate	7757-82-6	E514
Ammonium sulphate	7783-20-2	E517
Sodium hydroxide	1310-73-2	E524
Ammonium hydroxide	1336-21-6	E527
Sodium sulphate	7757-82-6	E541
Silicon dioxide	12926-00-8	E551
Sodium lignosulfonate	8061-51-6	E565
Stearic acid	57-11-4	E570
Dimethyl silicones and siloxanes	63148-62-9	E900

* Worst case calculation is based on the assumption that 1 kg food would be in contact with 6 dm² of product.

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 process of the product:

- 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

Some of the additives used in the manufacturing of the product contain 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



storaenso

November 1, 2022

5 (8)

Declaration of Compliance

Version: 2022:2

as sold to the final consumer. Based on the worst-case calculations the gluten content of product does not exceed 20 mg/kg and thus product is also considered as "gluten-free".

GMO

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

* Genetically Modified Organisms (europa.eu)

** Regulation 1831/2003 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."

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).

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>

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 product 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, 01 November 2022

Stora Enso Division Packaging Materials
Imatra Mills

Annina Baxter
Product Safety Manager



November 1, 2022

6 (6)

Declaration of Compliance

Version: 2022:2

Disclaimer

It is the responsibility of the manufacturer of the final product/package to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application and end use. This information 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 information is only valid at the date of this letter and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.*
- *This information is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- *Nothing in this information 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 information 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 information.*
- *No one other than the addressee may rely on this information and we assume no liability whatsoever to any third party.*
- *Any reference in this document to words "we" or "us" shall mean Stora Enso Oyj and/or its affiliate(s), as applicable from time to time.*



Statement
Metsä Board
1.10.2020

1 (10)

To: Comes

PRODUCT SAFETY STATEMENT

Product Name(s)	MetsäBoard Classic FBB
Production Site(s)	Metsä Board Simpele Finland (Paperboard), Metsä Board Kyro Finland (Paperboard)
Product Description	Fully coated folding boxboard, hard sized, GC2

The content of this statement is valid for the Metsä Board trade name(s) mentioned above.

Metsä Board is a leading European producer of folding boxboards and white linerboards. All our paperboards are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Products are manufactured in Metsä Board production sites in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001 and ISO/FSSC 22000.

FOOD CONTACT

Declaration of Compliance

We hereby state that this product is in compliance with the following global food contact laws and regulations. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations, taking also into consideration the declarations of compliance provided by our raw materials and additives suppliers and additional information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

EU:

Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use

Germany:

BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact (version 1.9.2017)	Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact
--	---

Italy:

D.M. 21/3/1973 and following updates and amendments concerning composition requirements (fillers, auxiliary substances and fibrous matters) for food products for which migration tests are required for purity	Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact
--	---

Metsä Board Corporation

P.O. Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4811

Business ID 0635366-7
www.metsaboard.com



Statement
Metsä Board
1.10.2020

2 (10)

To: Comes

requirements (PCBs, migration of lead) and migration of phenols and cresols

France:

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" as of 01/01/2019, with particular reference to the criteria of paragraph 3 and to paragraph 4

Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact

USA:

The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 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")

All food types, excluding infant formula and breast milk, under FDA's Conditions of Use A ("High temperature heat-sterilized (e.g., over 212°F)") through H ("Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use")

NON-USE WARRANTY

We hereby warrant that Metsä Board does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

- | | |
|----------------------|---|
| 1. Recycled material | This product is manufactured from virgin materials and does not contain any recycled materials. |
| 2. Plastic | This product is not considered to be plastic and does not contain plastic components according to the plastic definition of ISO 472:2013(E/F) Plastics — Vocabulary and Terminology for biorelated polymers and applications (IUPAC Recommendations 2012). |
| 3. Chlorine | Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF and BCTMP process is TCF. |
| 4. Fluorine | Fluorinated chemicals, such as perfluorinated chemicals (PFCs) including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid and its derivatives (PFOS) and other per- and polyfluoroalkyl substances (PFASs), are not used in the manufacturing of the product. |

According to third-party accredited laboratory testing, fluorine has not been detected in the product above a level indicating the use of PFCs.

Metsä Board Corporation
P.O.Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0635366-7
www.metsaboard.com



Statement
Metsä Board
1.10.2020

3 (10)

To: Comes

	<p>The following three specific perfluoroalkyl ethyl containing food-contact substances have not been used in the manufacturing of the product as listed in the rule 81 FR 5 by the Food and Drug Administration on 01/04/2016:</p> <ol style="list-style-type: none">1. Diethanolamine salts of mono- and bis (1H, 1H, 2H, 2H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solids basis2. Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl)thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2)3. Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis{[(gamma), [omega]-perfluoro C4-20 alkylthio) methyl]-1,3-propanediol, polyphosphoric acid and ammonium hydroxide
5. Heavy metals	<p>No heavy metals are intentionally added during the manufacturing process.</p> <ul style="list-style-type: none">• Heavy metal traces are under the limits regulated in Finnish legislation 268/1992 <p>Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in</p> <ul style="list-style-type: none">• Directive 94/62/EC on Packaging and Packaging Waste and its amendments• CONEG: The Model Toxics in Packaging Legislation
6. ResAP (2002) 1	<p>This product complies with the restriction limits set forth in Tables 1 and 2 of Council of Europe Resolution ResAP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs.</p>
7. Genetically modified organisms (GMO)	<p>No GMO raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.</p>
8. Animal origin, Halal, Kosher	<p>Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.</p>
9. Conflict minerals	<p>Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product.</p> <p>We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.</p>
10. POP Regulation and brominated flame retardants	<p>Substances listed in the Regulation (EC) No 2019/1021 on persistent organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).</p>
11. RoHS 2	<p>Directive 2011/65/EU (RoHS 2 Annex II) on the restrictions of the use of certain brominated flame retardants, heavy metals and phthalates in electrical and electronic equipment.</p>
12. California Proposition 65	<p>Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been</p>

Metsä Board Corporation
P.O.Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0635366-7
www.metsaboard.com



Statement
Metsä Board
1.10.2020

4 (10)

To: Comes

	performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
13. Endocrine disrupting chemicals (EDC)	Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 25.10.2018)
14. Ozone depleting substances	Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer. Substances listed in Montreal Protocol 1987.
15. UNEP 12 Chemicals, Persistent organic pollutants	Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment Programme 1997.
16. Epoxy derivatives	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
17. Other substances of concern	Anthraquinone Asbestos Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenol A and Bisphenol-A DiGlycidyl Ether (BADGE) Bisphenol F and Bisphenol-F DiGlycidyl Ether (BFDGE) Bisphenol S Butylated hydroxyanisole (BHA) Butylated hydroxytoluene (BHT) Colophony Creosote Fragrances Isopropylthioxanthone (ITX) Melamine Natural rubber latex materials Nitrocellulose Nonylphenols and nonylphenol ethoxylates, TNPP Novolac glycidyl ethers (NOGE) Polyvinylchloride (PVC) Titanium dioxide Triclosan

INDUSTRY GUIDELINES AND POLICIES

Metsä Board complies with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019, formally called "Industry Guideline" whose first publication dates back to 2010, under the aegis of CEPI and CITPA, and first revision to 2012. The guideline is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association), ACE (beverage cartons alliance), CCB (CEPI containerboard), FEFCO (corrugated packaging) and ETS (tissue paper association).

This product contains the following dual use substances with a quantitative restriction in food legislation:

Metsä Board Corporation

P.O.Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0835386-7
www.metsaboard.com



Statement
Metsä Board
1.10.2020

5 (10)

To: Comes

Calcium carbonate (E170).

REACH

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used.

This product complies with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

According to REACH Regulation chemical suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on this information this product does not contain Substances of Very High Concern above the reporting limit of 0,1%. Additionally, no SVHC's have been detected in control tests conducted in a third party laboratory.

ALLERGENS

We hereby warrant that substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of this product. This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs.

Some modified starches used as raw materials may originate from wheat or barley. However, this product can be considered gluten-free according to the definitions of Commission Implementing Regulation (EU) No 828/2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA.

MINERAL OIL (MOSH/MOAH)

This product is manufactured from fresh fibres and does not contain any printed recycled material. Mineral oils are not used as raw materials in the manufacturing of this product. All used production chemicals and additives are approved for food contact.

BIOCIDAL PRODUCTS

According to Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, this product is not defined as a treated article.

Biocides are used in the manufacturing process of this product to prevent harmful microbiological growth and to ensure the microbiological purity of the final product. No surface biocides are used and the transfer of antimicrobial constituents from the final product is tested in a third party laboratory to ensure no antimicrobial effect.

Metsä Board Corporation

P.O.Box 20, 02020 Metsä, Finland

Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0035366-7

www.metsaboard.com



Statement
Metsä Board
1.10.2020

6 (10)

To: Comes

NANOMATERIALS

We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paperboard production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

PALM OIL

Palm oil is not used as a raw material in the production process. Certain chemicals used in the production may contain minor quantities of palm oil, however, the possible amount of palm oil in the final product is low and never exceeding 0,1%. Metsä Board, as a responsible paperboard and pulp producer, requires its suppliers to ensure that their sourcing of palm oil is or will be according to the principles and criteria of the Roundtable of Sustainable Palm Oil (RSPO).

TOYS

This product complies with Directive 2009/48/EC on the safety of toys Annex II, Part III, point 13 migration limits for scraped-off toy materials.

This product complies with the restrictions for Phthalates, Benzene and Azocolorants/Azodyes concerning toys set forth in REACH Regulation (EC) 1907/2006 Annex XVII on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. For additional information regarding REACH Regulation please refer to the REACH section of this document.

This product does not qualify as consumer or children's product according to Consumer Product Safety Improvement Act of 2008 (CPSIA). A subsequent amendment to the CPSIA, Pub. L. 112-28 § 2, 122 Stat. 273 (Aug. 12, 2011), specifically exempts ordinary books, paper-based printed materials, and materials similar to paper from the lead testing requirements. In addition, Consumer Product Safety Commission (CPSC) regulation 16 C.F.R. § 1500.91(d) specifically exempts paper-based materials from lead testing, so long as they have not been treated or adulterated in a manner that would cause them to come out of compliance. Manufacturers and importers also are excused in *Notice of Requirements to Assess Conformity with the Limits on Phthalates in Children's Toys and Child Care Articles*, 76 Fed. Reg. 49,286, 49,288 n.2 (Aug. 10, 2011); from testing and certifying that there are no phthalates in materials that are known not to contain phthalates, including paper products (paper, paperboard, linerboard and medium, and pulp).

Other heavy metal limits apply to the surface coatings and substrates of children's toys intended for children 13 and under, as set forth in Toy Safety Standard ASTM F963. As this product does not qualify as such, the limits for heavy metals do not apply. However, based on the compliance with Directive 2009/48/EC, the heavy metal content of this product is well below the limits set by CPSIA.

PHARMACEUTICAL PRODUCT PACKAGING

Metsä Board has conducted testing and risk assessment regarding elemental impurities of Class 1 (As, Pb, Cd, Hg) and Class 2A (V, Co, Ni) as classified in ICH Q3D guideline on elemental impurities and identified no such

Metsä Board Corporation

P.O.Box 20, 02020 Metsä, Finland

Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0835366-7

www.metsaboard.com



Statement
Metsä Board
1.10.2020

7 (10)

To: Comes

level of impurities that would require additional controls for primary or secondary pharmaceutical product packaging.

JEWELLERY PACKAGING

Based on the Tappi T 406 method "Reducible sulphur in paper and paperboard" it can be confirmed that the level of reducible Sulphur in this product is less than 0,0008%.

HIGH TEMPERATURE MIGRATION

Suitability for high temperature applications has been tested by applying the test method EN 1186-13:2002 "Materials and articles in contact with foodstuffs. Plastics. Part 13: Test methods for overall migration at high temperatures" and the test conditions for overall migration from Regulation (EU) 10/2011 covering high temperature applications (120 minutes in 175 °C / 356 °F). Migration in the aforementioned conditions to the food simulant poly(2,6-diphenylphenylene oxide) is below 10 mg/dm² paperboard.

These migration results apply only to unprinted paperboard and functional barrier is recommended at high temperature applications. Please be aware it is the end user's responsibility to ensure the suitability of the food contact article in the intended conditions of use.

RISK MANAGEMENT

Metsä Board products are manufactured from fresh fibres and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils. Metsä Board evaluates all used raw materials and conducts internal risk assessment based on the supplier information.

All products are regularly tested by independent third party laboratories for food contact suitability and for globally recognized substances of very high concern, such as heavy metals. Routine and more specialised analyses are done in an internal research centre, where also new testing methods are developed. Toxicological tests have also been conducted by a third party laboratory and no genotoxicity of Metsä Board paperboards has been observed.

Metsä Board performs worst case migration calculations for all products and conducts testing as necessary. For example for PE coated paperboards migration testing is conducted according to Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food even though it is not mandatory for the final multi-material multi-layer materials and articles.

As paperboard has no harmonised measures for food contact testing in the EU, Metsä Board has additionally tested its paperboards for suitability for high temperature applications according to the Regulation (EU) No 10/2011. Based on the worst case calculations and test results, the migration of substances into food in applicable conditions is below the legal or recommended limit values for all Metsä Board paperboard products. Therefore the cumulative daily intake can also be estimated to be on an acceptable level.

Metsä Board systematically follows relevant global product safety concerns and reacts accordingly. Our personnel attends trainings regularly in order to maintain up-to-date knowledge on possible safety risks. Metsä Board follows the standardised risk management and food safety (ISO/FSSC 22000) principles.

Metsä Board Corporation
P.O. Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0635386-7
www.metsaboard.com



Statement
Metsä Board
1.10.2020

8 (10)

To: Comes

MATERIAL CIRCULATION

PACKAGING AND PACKAGING WASTE (EU)

We hereby warrant that this product is in compliance with the requirements of Directive 94/62/EC and its amendment 2004/12/EC.

PACKAGING AND PACKAGING WASTE (USA)

We hereby warrant that this product is in compliance with the requirements of CONEG (The Model Toxics in Packaging Legislation).

REQUIREMENTS FOR PACKAGING AND PACKAGING WASTE (EU & USA)

EN 13427 Requirements for the use of European standards in the field of packaging and packaging waste The procedures and record keeping enabling this declaration are part of Metsä Board's ISO 9001 and ISO 14001 management systems.

ISO 18601 General requirements for the use of ISO standards in the field of packaging and the environment

EN 13428 Requirements specific to manufacturing and composition. Prevention by source reduction During past few years Metsä Board has been able to reduce the weight of its products without compromising the important strength performance characteristics of the packaging. Reduction of the material weight is an important step towards the minimization of the packaging waste.

ISO 18602 Optimization of the packaging system

CR 13695-1 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment – Part 1: Requirements for measuring and verifying the four heavy metals present in packaging Concentrations of four named heavy metals are clearly below the regulated limits.

CONEG Certification / The Model Toxics in Packaging Legislation (USA)

CEN/TR 13695-2 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment. Part 2: Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment. Concentration of substances classified as hazardous is much less than 1 % of the product weight. Substances and mixtures classified as very* hazardous have not been used as raw materials in this product.

ISO 18602 Optimization of the packaging system **Very hazardous means the following classes of the Global Harmonized System (GHS): Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2), Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic environment (Acute 1 or Chronic 1) and Hazardous to ozone layer Cat. 1.*

EN 13429 Reuse

Not applicable. Packaging made of this product is not foreseen to be refilled or used for the same purpose for which it was conceived.

EN 13430 Requirements for packaging recoverable by material recycling

This product has been manufactured using fresh fibres and chemicals which are compatible with known, relevant and industrially available paper recycling technologies in the EU.

ISO 18604 Material recycling

Metsä Board Corporation

P.O.Box 20, 02020 Metsä, Finland

Revonäulenpuisto 2, 02100 Espoo, Finland

Tel. +359 10 4611

Business ID 0835386-7

www.metsaboard.com



Statement
Metsä Board
1.10.2020

9 (10)

To: Comes

EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value	This product is suitable for energy recovery, as it is composed of much more than 50 % of organic content.
ISO 18605 Energy recovery	
EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging	This product is industrially compostable according to EN 13432, ISO 18606 and ASTM D 6868.
ISO 18606 Organic recycling	
ASTM D 6868-11 Standard Specification for Labeling of End Items that Incorporate Plastics and Polymers as Coatings or Additives with Paper and Other Substrates Designed to be Aerobically Composted in Municipal or Industrial Facilities	

RECYCLABILITY (USA)

This product is capable of being recycled, whether as part of an industrial recycling program or curbside recycling available to consumers. The U.S. Federal Trade Commission, however, restricts claims of recyclability if recycling of a given material is not available to a "substantial majority of consumers or communities," which means at least 60% of consumers or communities have access to recycling. Currently, 73% and 50% of U.S. communities have access to recycling programs for unbleached and bleached paperboard, respectively, that rate can vary by a variety of factors. Thus, recycling facilities for bleached paperboard may not exist in your area.

This product is made of fresh fibres originating from Northern European forests. The pulp types used are high brightness BCTMP (Bleached chemi-thermomechanical pulp), chemical pulp (Kraft) and in some cases mechanical pulp. Metsä Board produces BCTMP at Kaskinen and Joutseno mills, Finland, by using modern own-patented technology. The bleached chemical pulp is made in Metsä Group mills in Sweden and Finland. The product specific compositions are listed in the Product composition table below. More information available in product specifications and paper profiles of each product.

Product composition table:

Product name	Brightness top %	BCTMP %	Chemical pulp %	Mechanical pulp %	Pigments and fillers %	Binders %	Moisture %
MetsäBoard Natural FBB	80,5	51	33		3	4	8
MetsäBoard Natural FSB Cup	82	28	59		1	3	9
MetsäBoard Natural WKL	75		84		7	1	8
MetsäBoard Natural WKL Bright	86		81		8	3	8
MetsäBoard Classic FBB	84	16	25	36	10	5	8
MetsäBoard Classic WKL	77		82		10	1	7
MetsäBoard Pro FBB Bright	91	44	30		13	5	8
MetsäBoard Pro FBB OBAfree	84	48	29		11	5	8
MetsäBoard Pro FSB Cup	85	18	59		9	5	9
MetsäBoard Pro WKL	82		78		13	2	7
MetsäBoard Prime FBB Bright	91,5	45	30		14	4	7
MetsäBoard Prime FBB EB	85	43	30		12	6	8
MetsäBoard Prime WKL	82-85		75		17	2	6

Metsä Board Corporation

P.O.Box 20, 02020 Metsä, Finland

Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0635366-7

www.metsaboard.com



Statement
Metsä Board
1.10.2020

10 (10)

To: Comes

Accordingly, Metsä Board recyclability claims are limited to the Metsä Board's products, and do not apply to any final package made from them. We recommend that our customers ensure they have adequate substantiation to support any claims of recyclability or other environmental performance with respect to their specific packaging configuration.

DISCLAIMER

The information provided in this statement applies only for the paperboard, barrier coated paperboard or pulp material as delivered by Metsä Board Corporation and may not substitute necessary end use testing. Metsä Board Corporation 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 the product for a particular application or end use.

The information given in this statement has been verified by Metsä Board Corporation 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.

The recipient of this statement acknowledges that the copyrights, patents, trade secrets, rights of ownership and/or use in respect of the information given in this statement belong to Metsä Board Corporation. Any copying, distribution, sending, transmission or publication of information provided in this statement is prohibited unless Metsä Board's prior written consent has been given.

METSÄ BOARD CORPORATION

For any queries or questions regarding the statements presented herein, please contact:
sustainability.metsaboard@metsagroup.com

Metsä Board Corporation
P.O.Box 20, 02020 Metsä, Finland
Revontulenpuisto 2, 02100 Espoo, Finland

Tel. +358 10 4611

Business ID 0635366-7
www.metsaboard.com