



Regulatory Compliance

Statement for:	Sofel Tech
Products:	BillerudKorsnäs Conflex Base D
Production site:	BillerudKorsnäs Finland Oy, Pietarsaari Paper Mill

Food contact

The product is suitable for packaging of dry, aqueous and fatty foods. For packing of aqueous and fatty products we recommend a suitable barrier to avoid the food to affect the physical properties of the product.

The product is manufactured from virgin fibres with addition of chemicals that meet the demands in FDA and BfR and also in accordance with good manufacturing practice.

Under normal, applicable and foreseeable conditions of use, the product does not transfer any constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof.

The product complies with the applicable paragraphs in:

- Regulation (EC) No 1935/2004 with amendments on materials and articles intended to come into contact with food.
- Regulation (EC) No 2023/2006 with amendments on good manufacturing practice for materials and articles intended to come into contact with food.
- The German Food Law §§ 30 und 31 in der Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (LFGB).
- BfR, Recommendation XXXVI (June 1st, 2019), paper or paperboard which is intended to be used at temperatures up to 90°C (holding and reheating of food).
- FDA Code of Federal Regulation Title 21, Chapter 1, §176.170, §176.180 (April 1st, 2018), Components of paper and paperboard in contact with aqueous, fatty and dry foods,
 - Conditions of use E-G table 2 of §176.170(c)
 - All Food Types

For specification of Conditions of use and Food types see appendix 1

- As BillerudKorsnäs does not manufacture the finished paper/board product, we need to notify you that our product may contain chemicals listed in paragraph (b) and as such the final paper/board product must be tested in accordance with paragraph (c) of 21 CFR 176.170.



Packaging and Packaging Waste Directive

The product complies with Packaging and Packaging Waste Directive 94/62/EC with amendments. This directive defines requirements for the manufacturing and composition of packaging and prescribes fulfilment of essential requirements. This can be fulfilled by the use of harmonized EN standards.

The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium is well below 100 parts per million by weight.

The level of substances classified as hazardous to the environment is less than 0.1% and minimized (EN 13428).

The products are suited for energy recovery (EN 13431) and for material recycling (EN13430). The product fulfils the demands for industrial composting (EN13432).

REACH

BillerudKorsnäs sites comply with the requirements/obligations of REACH, Regulation (EC) No 1907/2006 with amendments. BillerudKorsnäs is mainly a Downstream User of chemicals, which means that our suppliers are responsible for the registration of the chemicals that we purchase. Substances and Intermediates produced at our pulp mills are registered.

Pulp is exempted from REACH registration.

Our fibre based products are defined as articles according to REACH.

There are requirements in REACH for substances of very high concern (SVHC). We regularly monitor the amendments of the Candidate list for Substances of Very High Concern and in the Annex XIV of the Regulation.

Based on information from our suppliers we state that no SVHC substances listed in the "Candidate List of Substances of Very High Concern" from the European Chemicals Agency are present in concentrations above 0.1% in our products.

Disclaimer

The information provided in this declaration is provided based on our actual knowledge about the product and its components. BillerudKorsnäs assumes no responsibility for any deviations from this information which is due to facts or circumstances beyond our actual knowledge about the product and its components.

The product is sold without any express or implied warranty as regards fitness for any specific purpose of use. It is the user's responsibility to satisfy themselves as to the paper's suitability for the particular purpose(s) for which the user intends to use the paper and to obtain all necessary information for such assessment. It is the customer's responsibility to assure the appropriate, safe and legal use and handling of our products.

The information in this declaration is subject to the limitations of liability and other applicable provisions set forth in general trade rules or any other separate written agreement governing the sale and purchase of products between BillerudKorsnäs' and the addressee of this declaration.

This statement is valid from date of signing until further notice, however not longer than for 18 months.



BILLERUDKORSNÄS

Pietarsaari 2020-11-23
BillerudKorsnäs Finland Oy

Ella Viitiö
Product Safety Specialist



Appendix 1 FDA Food types and Conditions of use

FDA CFR Title 21 §176.170 Components of paper and paperboard in contact with aqueous and fatty foods (dated April 1st, 2018). Table 1 and table 2 are available on [FDA Website](#).

Food Types from Table 1 in 21 CFR 176.170 (c),

- I. Nonacid, aqueous products; may contain salt or sugar or both (pH above 5.0).
- II. Acid, aqueous products; may contain salt or sugar or both, and including oil-in-water emulsions of low- or high-fat content.
- III. Aqueous, acid or nonacid products containing free oil or fat; may contain salt, and including water-in-oil emulsions of low- or high-fat content.
- IV. Dairy products and modifications:
 - A. Water-in-oil emulsions, high- or low-fat.
 - B. Oil-in-water emulsions, high- or low-fat.
- V. Low-moisture fats and oil.
- VI. Beverages:
 - A. Containing up to 8 percent of alcohol.
 - B. Nonalcoholic.
 - C. Containing more than 8 percent alcohol.
- VII. Bakery products other than those included under Types VIII or IX of this table:
 - A. Moist bakery products with surface containing free fat or oil.
 - B. Moist bakery products with surface containing no free fat or oil.
- VIII. Dry solids with the surface containing no free fat or oil (no end test required).
- IX. Dry solids with the surface containing free fat or oil.

Conditions of use from table 2 in 21 CFR 176.170 (c),

- A. High temperature heat-sterilized (e.g., over 212 °F)
- B. Boiling water sterilized
- C. Hot filled or pasteurized above 150 °F
- D. Hot filled or pasteurized below 150 °F
- E. Room temperature filled and stored (no thermal treatment in the container)
- F. Refrigerated storage (no thermal treatment in the container)
- G. Frozen storage (no thermal treatment in the container)
- H. Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use