Supporting document for declaration of compliance

Certificate of compliance with regulations for paper in contact with food

Customer: BillerudKorsnäs Finland Oy

Product: ***BK Axello/Xpression*** Natural Brown
BK Prime, Brown, H, Wrap / ***Abra Base*** / ***SwanBase***
BK ConFlex Base, D, DH / **Release Base**, D

We have obtained from the producer detailed information concerning raw materials and additives. We have also analysed the aforementioned Product sample using methods, which are listed in Appendix 1. Based on our investigations, we consider the Product to comply with the following regulations in terms of its chemical composition:

- *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*
- *European Parliament and Council Directive 94/62/EC on packaging and packaging waste, concerning the amount of metals*
- *EN 13432, Annex A. Table A1, Packaging recoverable through composting and biodegradation*
- *Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH); phthalates in toys and childcare articles.*
- *Law concerning the revision of the foodstuffs and animal feed legislation of updated version 30.6.2017, §§ 30 and 31, Germany*
- *BfR recommendation no. XXXVI, 1.9.2017, Germany*
  In terms of its chemical composition, the Product represented by the samples tested is suitable as packaging material for dry and non-fatty as well as moist and fatty foodstuffs at temperatures up to 90°C.
- *FDA regulations, 21 CFR, parts 170-189, 1.4.2018, USA*
  In terms of its chemical composition, the Product represented by the samples tested is suitable as packaging material for dry as well as aqueous and fatty foods.
- *EN 71-3 Safety of Toys: Migration of certain elements*
- *EN 71-9 Safety of Toys: Organic chemical compounds*

Sensory evaluation for odour and off-flavour indicates that the Product tested is not inclined to bring about deterioration in the organoleptic characteristics of food being in contact with the Product.
No more than 1000 µg/l aluminium was detected in cold water extract.

Espoo, 29.4.2019

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Appendix 1

Test methods used in the commission

EN 1230-1, Sensory analysis: Odour*

EN 1230-2, Sensory analysis: Off-flavour*

EN 647, Hot water extract

EN 645, Cold water extract

EN ISO 15318 mod., Determination of polychlorinated biphenyls (PCB)*

EN 1541, Determination of formaldehyde in an aqueous extract*

EN 1104, Determination of the transfer of antimicrobial constituents

ISO 8784-1 and DIN 54378, Total count of bacteria, yeast and mould based on disintegration

EN 71-3, Migration of certain elements*

Metals, internal method

Phthalates, Internal method

Biocides, isothiazoles, internal method

Chloroform soluble extractives in water (24h, 120°F), FDA, Internal method

* Accredited method

Distribution Customer, electronically approved