

# Declaration of Compliance

<p>Issued by:</p> <p>Mondi Steti a.s. Litomericka 272 411 08 Steti Czech Republic</p> <p>(hereinafter "Mondi")</p>	<p>To:</p> <p>TIP TRADING SPOL. S.R.O. LINECKA 349 382 41 KAPLICE Czech Republic</p>
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**Paper grade:** Advantage Smooth White Strong (hereinafter "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.

## Regulations and Guidelines

We confirm that the paper listed above complies with the requirements of the following regulations, recommendation and directive:

- Regulation (EC) 1935/2004 - on materials and articles intended to come into contact with food
- Regulation (EC) 2023/2006 - on good manufacturing practice (GMP)  
for materials and articles intended to come into contact with foods
- German Recommendation XXXVI - on paper and board for food contact (BfR)
- Code of Federal Regulations, Food and Drugs (FDA)  
21 CFR Ch. I (29 March 2022 edition), §§ 176.170 and 176.180
- Directive 94/62/EC - on packaging and packaging waste
- Regulation (EC) 1907/2006 - concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

The marketability in Italy is given by means of the Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last modification of 31 May 2016.

## Description of application

The paper listed above can be used safely for food packaging for the following foodstuffs:

- direct contact with dry, moist and fatty foodstuffs

## Regulation (EC) 1935/2004 - on materials and articles intended 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 listed above is given by fulfilling the requirements of the German Recommendation XXXVI.

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

The production of food contact materials at Mondi follows the requirements of the BRCGS Packaging Materials Issue 6, August 2019 standard, which is externally verified on a regular basis, thereby fulfilling the GMP requirement according to Regulation (EC) 2023/2006.

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

The paper listed above may be used safely for the given application- please see "Description of application"

## Directive 94/62/EC - on packaging and packaging waste

The paper listed above fulfills the requirements of heavy metals concentration (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 Council Directive 94/62/EC on packaging and packaging waste.

The paper listed above fulfills the disposal requirements (in minimum one of the four listed procedures has to be confirmed):

- Reuse (EN 13429:2004 packaging - reuse)
  - not applicable
- Recovery in the form of material recycling (EN 13430:2004 packaging - requirements for packaging recovery by material recycling)
  - requirements fulfilled
- Recoverable in the form of energy recovery (EN 13431:2004 packaging - requirements for packaging recoverable in the form of energy recovery)
  - requirements fulfilled
- Packaging recoverable in the form of composting or biodegradable packaging (EN 13432:2000 packaging - requirements for packaging recoverable through composting and biodegradation)
  - Paper is generally seen as biodegradable (in order to ensure the biodegradability of complex paper structures, we recommend the verification according to EN 13432:2000 in general). Please contact the technical sales service whether the paper is EN 13432:2000 certified.

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

The paper listed above is regarded as "article" and no REACH registration is needed.

All suppliers of chemicals have confirmed their obligation of information towards Mondi in case of any REACH relevant changes in their product composition.

We confirm to fulfill the obligation of immediately informing on all REACH relevant changes of the paper listed above according to Regulation (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).

## **Restricted substance**

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 additives**

Due to the interactions of the additives with the cellulose fibres, the conditions in the production (dewatering and thermal drying) and the used application, there is currently no discussion of dual use additive transfer from paper-based packaging to the packed goods known in our industrial sector for the listed applications - please see "Description of application". Please be aware that cellulose (the main constituent of pulp and used in paper manufacturing) is a dual use additive (E 460).

In order to fulfill our obligation to inform our customers regarding dual use additives: Our suppliers (supplier statements) informed us on the usage of the following dual use additives (according to Regulation (EC) No 1333/2008) in their delivered products:

- E 520
- E 558
- E 524
- E 251

## **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.

## **Per- and polyfluoroalkyl substances (PFAS)**

Not applicable. The paper produced by Mondi is a 100% pure virgin fiber based paper and is not grease-proof nor plastic coated.

## **Disclaimer**

Reels made out of the paper should be stored wrapped and in a good ventilated storehouse according to the recommended conditions (temperature between 15°C and 25°C, relative air moisture between 50% and 70%). Before converting, materials should be acclimatized to predominant conditions at converting line(s). Reels which have not been fully used should be repacked similar to conditions delivered. Reels should be protected from strong radiation by heating systems.



Tomas Durda



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This statement is valid until 20.10.2023 or good till canceled.