



Europapier Polska Sp. z o.o.
Aleje Jerozolimskie 142 A
02-305 Warszawa
POLAND

Product Safety Statement

R-FC-2025-02

Company: MM BOARD & PAPER
Production Site: MM Kolicevo d.o.o.
Product(s): MCM (4:2:127)
Revision Date / Version: 01 January 2025 / V02
Date of issue: 18 June 2025

Certificates of our certified management systems at the production site are available on our website: <https://mm.group/board-paper/certificates/>.

1. Food Contact: Declaration of Compliance

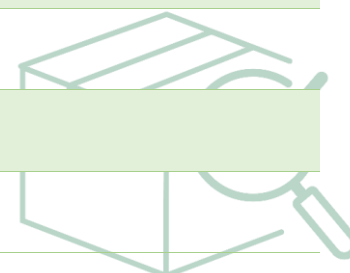
We hereby state that the above mentioned article(s) under foreseeable conditions of intended use are compliant with the following food contact regulations and recommendations as amended.

The cartonboard quality (qualities) may stand in direct contact with dry, non-fatty and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs having a large surface area, migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be compensated by the use of an appropriate additional packaging.

The cartonboard quality is intended to come in contact with food at temperatures up to 90° (holding and reheating of food). The material is not tested on suitability for higher temperatures.

The compliance applies to both sides of the product(s), unless otherwise stated.

EU Regulation (EC) No 1935/2004	Compliant
EU Regulation (EC) No 2023/2006	Compliant
EU Resolution CM/Res(2020)9	Compliant
Austria LMSVG	Compliant





Germany BedGgstV and LFGB	Compliant
Germany BfR Recommendation XXXVI	Compliant
France DGCCRF - Fiche MCDA n° 4	None of the substances listed under 4.2 in Fiche MCDA n° 4 MCDA is intentionally used but due to impurities in raw materials we cannot exclude traces. Compliance cannot be confirmed.
Italy D.M. 21/03/1973	Product can be used in compliance with D.M. 21/03/1973.
Switzerland SR 817.02 article 49	Compliant

2. Additional Regulations and Guidelines:

REACH Regulation (EC) 1907/2006	No currently listed SVHC is present above the limit of 0.1 % in any of our products.
Packaging and Packaging Waste Directive 94/62/EC	Please see point 4 (heavy metals) and 6
POP Regulation (EU) 2019/1021	None of the substances listed in Annexes I to IV of this regulation is intentionally contained.
RoHS II Directive 2011/65/EC	Not applicable; RoHS II is only applicable for electric and electronic compounds.
Toys EN 71-3	Requirements on migration of certain elements are fulfilled.
California Proposition 65	The presence of minor traces of substances listed in California Proposition 65 cannot be excluded.
CEPI	As a CEPI member, we follow CEPI's Guidelines on paper and board for food contact

3. Raw Materials

Please refer to product info sheets for product specific board structures.

Fibres	Contains recovered fibres
Chlorine / Bleaching	In the collection of recycled fibres, no distinction can be made between chlorine-bleached, chlorine-free bleached or totally chlorine-free bleached papers. We do not use bleaching processes with elemental chlorine and/or chlorine compounds in the production. The manufacturing process can therefore be described as process chlorine free (PCF).



4. Substances of Concern:

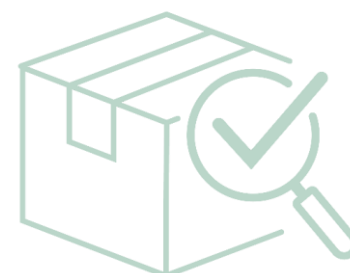
Allergens	<p>Various starches are used during the production of cartonboard. Among others, wheat starch is used, which contains gluten. Acc. to Regulation (EU) No.1169/2011 Annex II, wheat is considered as a substance that causes allergies or intolerances.</p> <p>However, worst-case studies conducted by independent institutes have shown that gluten is not detectable on the finished cartonboards. Therefore, a transfer of gluten from the cartonboard to the packaged food is considered extremely unlikely.</p> <p>Possible traces of Sulphur dioxide are far below concentrations that may cause allergies or intolerances.</p> <p>No other allergens according to Regulation (EU) No. 1169/2011 Annex II are intentionally contained.</p>
Animal origin / Halal / Kosher	<p>No animal derived raw material or potable alcohol is constitutionally contained.</p>
Biocides / Slimicides / Preservatives	<p>Biocides in our board qualities are exempted from the scope of Regulation (EU) No. 528/2012 according to Article 2 (5) b.</p> <p>Slimicides and preservatives in chemical aids used for the production or used during the production of boards fulfill applicable provisions such as those given in German BfR Recommendation XXXVI and/or other valid regulations.</p> <p>Cartonboard intended to come into contact with foodstuffs must have no preserving effect on the foodstuffs with which they come into contact. Tests acc. to DIN EN 1104 to determine the transfer of antimicrobial constituents are performed on a regular basis.</p>
CMR	<p>No CMR 1A, 1B and CMR 2 substances acc. to Regulation (EC) No 1272/2008 are intentionally added in concentrations above relevant concentration limits subject to labeling.</p>
Conflict Minerals (3TG)	<p>As per section 1502 of the Dodd-Frank Wall Street Reform Act no tantalum, tungsten, tin or gold is used in the production process.</p>
Endocrine disrupting chemicals	<p>None of the identified or potential EDSs currently listed under www.edlists.org are intentionally contained in quantities > 0.1 %.</p>
Genetically modified organisms	<p>No raw materials that contain genetically modified organisms (GMO) are intentionally used during the production process.</p>
Heavy Metals	<p>No heavy metals are intentionally added during the production process; the limit of heavy metals [Sum of Pb, Cd, Hg and Cr(VI) < 100 ppm] acc. to Directive 94/62/EC is not exceeded.</p>
Microplastics	<p>Microplastic particles that might be released to the environment when used in accordance with the intended use are not intentionally contained.</p>



<p>Mineral oil compounds</p>	<p>No mineral oils are intentionally used or added during the production process. But the presence of Mineral Oil Aromatic Hydrocarbons (MOAH) has to be expected in cartonboard qualities manufactured using recycled fibers.</p> <p>Quantities that can be verifiably and measurably transferred to the product packed in the cartonboard have to be assumed.</p> <p>For the packaging of dry foods with a low fat/oil content ($\leq 4\%$ fat/oil), a measure must be taken by the packer to reliably prevent the limit of quantification of 0.5 mg MOAH /kg food* from being exceeded is not exceeded over the life cycle of the packaged product.</p> <p>For foods with a higher fat/oil content ($> 4\%$ fat/oil) that are packed in the cartonboard, the packer must ensure and, if necessary, take appropriate measures to ensure that the limit of quantification of 1 mg MOAH/kg food* is not exceeded over the life cycle of the packaged product.</p> <p>*Limits according to Summary Report published by the EU Standing Committee on Plants, Animals, Food and Feed</p>
<p>Nanomaterials</p>	<p>No nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2022/C 229/01 are intentionally contained.</p> <p>Low quantities of particles in nanometer scale may be present in some of our raw materials. These particles are bound within the matrix of our cartonboard products during the production process. Therefore, these particles cannot be released and a transfer to the packed product is not to be assumed.</p>



<p>Not intentionally added substances (NIAS)</p>	<p>The NIAS levels of the following compounds are routinely monitored and lie within applicable limits:</p> <ul style="list-style-type: none"> - 4,4'-Bis(dimethylamino)-benzophenone - Benzophenone (4-Methylbenzophenone, etc.) - Bisphenol A (BPA) - Bisphenol S (BPS) - Di-isopropyl-naphthalin (DIPN) - Formaldehyde - Heavy Metals and Aluminium - Pentachlorophenol (PCP) - Perfluorinated substances (PFAS) - Phthalates (Di-ethylhexylphthalat, Di-n-butylphthalat, Di-isobutylphthalat, Di-octylphthalat, Benzylbutylphthalat, Di-methylphthalat, etc.) - Polychlorinated biphenyls (PCBs) - Polycyclic aromatic hydrocarbons (PAHs) - Primary aromatic amines (PAAs)
<p>Optical Brighteners (OBA)</p>	<p>Traces of optical brighteners can be present. The above mentioned food contact suitability is given based on the results of the determination for the fastness of fluorescent whitening agents according to EN 648.</p>
<p>Other substances of concern</p>	<p>None of the following substances is intentionally added during the production process:</p> <ul style="list-style-type: none"> - Alkylphenols and alkylphenol ethoxylates - Bisphenoles - Butylhydroxyanisole / Butylhydroxytoluene (BHA / BHT) - Epoxyderivatives (BADGE, BFDGE, NOGE) - Ozone depleting substances - Parabens - Perfluorinated substances (PFAS) - Polybrominated biphenyl, polybrominated diphenyl ethers (PBB, PBDE) - Polyvinyl chloride, Polyvinylidene chloride (PVC, PVdC) - Titanium dioxide



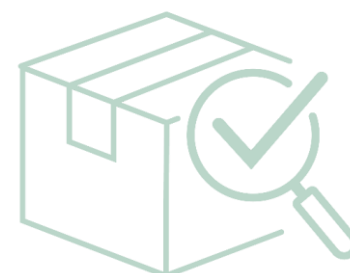
5. Dual Use Substances:

Based on the information given from the suppliers of our raw materials and on the knowledge of the manufacturing process, the following dual use food additives and flavourings - as listed in Regulations (EC) No 1333/2008 and (EC) No 1334/2008 - may be contained:

Substance	E number
Calcium carbonate	E 170
Sodium nitrate	E 251
Acetic acid	E 260
Sodium acetates	E 262
Citric acid	E 330
Phosphoric acid	E 338
Sodium phosphates	E 339
Potassium phosphates	E 340
Calcium phosphates	E 341
Magnesium phosphates	E 343
Adipic acid	E 355
Calcium stearate	E 470a
Sorbitan monolaurate	E 493
Hydrochloric acid	E 507
Magnesium chloride	E 511
Sulphuric acid	E 513

Substance	E number
Sodium sulphates	E 514
Aluminium sulphate	E 520
Sodium hydroxide	E 524
Ammonium hydroxide	E 527
Silicon dioxide	E 551
Magnesium silicate	E 553a
Talc	E 553b
Bentonite	E 558
Polyvinyl alcohol (PVA)	E 1203
Oxidised starch	E 1404
Monostarch phosphate	E 1410
Distarch phosphate	E 1412
Acetylated starch	E 1420
Propane-1, 2-diol	E 1520
Polyethylene glycol	E 1521
Cellulose	E 460

Transfer of above mentioned substances into food in relevant quantities is not to be assumed.



6. Recyclability / Material Circulation:

MM BOARD&PAPER's cartonboards can be classified as "recyclable" within standard stock preparation of the packaging paper industry and can be used to produce new recycled paper and cartonboard products. This was demonstrated by practical tests at MM BOARD & PAPER WLC mills.

Please note that the recyclability also depends on the packaging design and construction as well as the available recycling technologies in specific regions.

We fulfil the requirements of the following harmonized CEN standards and relating CEN reports according to directive 94/62/EC:

EN 13427 (Umbrella)	Describes how to handle the series of standards and is reflected in ISO 9001 and energy management documentation.
EN 13428 (Prevention)	not applicable; relates to the final packaging
EN 13429 (Reuse)	not applicable
EN 13430 (Material recycling)	is fulfilled
EN 13431 (Energy recovery)	The product is suitable for energy recovery.
TR 13695-1 (limits of heavy metals)	The limit for Sum of Pb, Cd, Hg and Cr(VI) < 100 ppm is not exceeded.
TR 13695-2 (other noxious substances)	limits not exceeded

According to the identification system for packaging materials - pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste - the applicable code for the above mentioned quality is PAP 21.

MM BOARD&PAPER qualities mainly consist of renewable, natural raw materials such as wood fibres that are biodegradable in nature.

The currently well-known home compost standards were designed for bioplastics. They are therefore not fully applicable to paper and board, due to the different nature of the materials.

Recovered paper is a valuable resource with well-established recycling loop: Recycle it!





Disclaimer:

The information in this document is based on written information provided by our suppliers, regular analysis of representative cartonboard samples, internal risk analysis, analytical reports and certificates of compliance given by independent accredited laboratories.

This information is only valid for the specified product under observance of the specified conditions of use. We are not liable in case the transmission of such information is subsequently omitted by the buyer. Moreover, such information will not become part of any existing or future agreement we conclude with you. In addition, any disclosure of such information to the public or third person, even partly, requires our prior written consent.

The information provided herein refers to the regulations valid at the time of issue. Future changes in legislation, manufacturing process and final intended applications cannot be taken into account. Re-issuance of the declaration is strongly recommended within 2 years.

This document does not give any comment on the technical suitability of the requisite concerned.

Storage recommendations as given in the product technical data sheet have to be observed.

This document is issued electronically.

