MM Frohnleiten GmbH Member of MM BOARD & PAPER



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

3 August 2022

STATEMENT

As requested we are confirming that our cartonboard quality (qualities)

Multicolor Mirabell (4:2:127)

is (are) produced to the generally approved technical requirements using paper for recycling and complies (comply), when used in accordance with its (their) suitability, with the Foodstuffs and Animal Feeding Code – LFGB of the Federal Republic of Germany in the version of the notification of 03 June 2013 (BGBI. I S. 1426), last modified by art. 97 of the regualtion of 19 June 2020 (BGBI. I p. 1328).

The cartonboard quality (qualities) also complies (comply) with the recommendation XXXVI "paper, cartons and cartonboard for food packaging" of the "Bundesinstitut für Risikobewertung", 62nd notification, federal law gazette 14 (1971) 83, last amended by the 223nd memorandum, Federal Health Journal 64 (2021) 764, state of 1 April 2021. 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. No comments are given on the technical suitability of the requisite concerned.

Furthermore the cartonboard quality (qualities) complies (comply) with the requirements of the resolution of the European Council AP (2002) 1 about paper, cartons and cartonboard for food contact of 17 September 2002, whereupon instead of the techn. doc. 1 which is not implemented up to now, the stated list of factory additives of the recommendation XXXVI of the German "BfR" have been consulted.

The cartonboard quality (qualities) mentioned herein also complies (comply) with Austrian regulations particularly with the food packaging regulations (LMSVG of 20 January 2006, BGBI. I, no. 13/2006).

The provisions of the regulation (EC) No. 1935/2004 of the European Parliament and the Council of 27 October 2004 as well as of the regulation (EC) No. 2023/2006 of the European Parliament and the Council of 22 December 2006 concerning materials and articles, which are intended to be brought into contact with foods, are therewith fulfilled.

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The cartonboard is manufactured using recycled fibers. With this fibers, the presence of Mineral Oil Aromatic Hydrocarbons (MOAH) is to be assumed in quantities that can be verifiably and measurably transferred to the product packed in the cartonboard.

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.

For foods with a higher fat/oil content (> 4% fat/oil) that are packed in the cardboard, 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.

The processes and procedures in our mill are well established, controlled and measured by excellent quality management systems such as ISO 9001 (since 1996) and hygiene management system (HACCP) according to EN 15593. The risk management as well as the root-cause analysis are an essential part of our management systems and ensures a safe production of board for food applications.

This statement is valid for deliveries until 31 December 2023, provided there is no prior change to the regulations.

* Limits according to Summary Report published by the Standing Committee on Plants, Animals, Food and Feed on 21 April 2022

This document is issued electronically.

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