



20.09.2021

Declaration of Compliance

Version: 2021:2

Trade name	Endura MG Kraft by Stora Enso (hereafter referred to as the product)
Product description	The product is a one-side machine glazed, brown Kraft paper. Endura MG Kraft wrapping paper, paper for packaging production, used as a base for further converting processes.
Grammage	Ranges between 30 g/m ² to 100 g/m ² For more information see technical specification.
Fiber source	virgin fibers: 100% unbleached, elementary chlorine free (ECF) pulp
Production site	Endura MG Kraft by Stora Enso is manufactured at Stora Enso Division Packaging Materials, Ostrołęka Mill
Producer	Stora Enso Division Packaging Materials, Ostrołęka Mill, Poland

Please note that safe and appropriate use in this context means food safety. There might be technical limitations that any downstream operator in the food value chain needs to take into account and test separately before use. E.g. product might need additional barrier layer when used in contact with liquids.

Any downstream operator in the food value chain is responsible for the suitability and food safety at the intended end-use.

For questions regarding if a specific end-use (food type and/or conditions) is not covered by this declaration please contact the local Stora Enso sales office for more information.

Compliance with European food contact legislation

Information given in this declaration is based on our current knowledge, written confirmation from our chemical suppliers as well as analysis performed on representative product samples.

For the purpose to achieve high chemical and microbiological purity only fresh and virgin fibers and food contact approved chemical additives are used as raw material in the manufacturing of product. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

We hereby declare that this product before converting complies where applicable and under foreseeable conditions of use with the requirements of **Regulation (EC) No 1935/2004** on materials and articles intended to come into contact with food as well as **BfR Recommendation XXXVI** on paper and board for food contact. This product is manufactured in accordance with **Commission Regulation (EC) No 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food.

This product is approved for direct food contact with dry, moist and fatty foodstuffs.

This paper is intended to be used as wrapping paper and may stand in direct contact with dry, fatty and moist foodstuffs at room temperature or below and for a short contact up to 90°C as defined in BfR Recommendation XXXVI.

For organoleptically sensitive end-use applications suitability of the final packaging system shall be tested and confirmed by the customer.

Please also see storage conditions.

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Food Contact Guidelines

The *Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles* for food contact provides harmonised approach for self-regulation of paper and board. Stora Enso as a company supports and operates according to the Food Contact Guideline. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site;

https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines_2019.pdf

Analyses

Compliance with BfR Recommendation XXXVI

The product complies with the requirements in BfR Recommendation XXXVI as follows. Analyses have been performed on representative samples of paperboard.

Heavy metals:

Cadmium (Cd) < 5 µg/l in the cold water extract of the paperboard
Lead (Pb) < 10 µg/l in the cold water extract of the paperboard
Aluminium (Al) ≤ 1 mg/l in cold water extract of the paperboard

Formaldehyde

Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1,0 mg/dm².

Hemmhof test:

Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents.
We do not add surface biocides on top of the paperboard.

Other heavy metals:

Chromium VI (Cr) < 0,25 mg/kg
Mercury(Hg) < 0,3 mg/kg

Compliance with US food contact legislation, FDA

Information given in this declaration is based on written confirmation from our chemical suppliers as well as analysis performed on representative paperboard samples.

Based on the information regarding the formulation, limitations on the used chemical additives as well as the results of the applicable extraction tests we confirm that this product complies with 21 C.F.R. §176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and §176.180 ("Components of paper and paperboard in contact with dry food") and may be used as intended in contact with all foods described in tables 1 and 2 of 21 C.F.R. §176.170.

Substances

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that we do not analyze the product for the substances listed below. Information below is based on information given by our chemical suppliers.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the manufacturing of the product. Our suppliers can however not exclude adventitious and technically unavoidable contamination**.



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* http://ec.europa.eu/food/food/biotechnology/index_en.htm

** Regulation 1830/2003 on traceability and labeling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

Animal origin

We hereby confirm that no additives of animal origin are intentionally added in the production.

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and Creutzfeldt Jakob Disease, CJD are intentionally added in the production of product.

Based on our current knowledge, this product could qualify with vegan certification criteria.

Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II, the following food allergens or products derived thereof are not intentionally added for the manufacture of product:

- Cereals containing gluten and products thereof*
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof*
- Peanuts and products thereof
- Soybeans and products thereof*
- Milk and products thereof*
- Nuts and products thereof*
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂.
- Lupin and products thereof
- Molluscs and products thereof

*Please notice the exceptions in Commission Directive 1169/2011/EC, Annex II

CMR substances

Based on information from our suppliers of chemical additives, substances classified as "carcinogenic", "mutagenic" or "toxic for reproduction" in Regulation (EC) 1272/2008, in concentrations over the legislative limits stated in the material data sheets for our chemical products, are not used as raw material and are not intentionally added in the product.

REACH Regulation (EC) 1907/2006

We continuously monitor the development of the Candidate List of Substances of Very High Concern, the substances for authorization as well as any restrictions applicable to our use. To our knowledge and based on the information from our suppliers today we can confirm that none of our articles contains substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorisation) in a concentration above 0.1% (w/w).



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Certified management systems at the production site/sites

Certificates are available on the internet: <https://www.storaenso.com/en/download-centre?d=1&t=1>

Paperboard production

ISO 9001

ISO 14001

ISO 45001

FSC® CoC

PEFC CoC

FSC - Certificate Code INS-COC-100054, License Code FSC-C127282, Controlled Wood Code INS-CW-100054

PEFC - Certificate number 8949-04-01, PEFC logo licence No. PEFC/02-31-247

Storage and handling requirements

In order to secure and ensure product safety and quality the product must well wrapped and stored indoor under normal conditions (50% relative humidity and 19-23° C) and good protection, sheltered from rain and snow. Open the protective wrapping only at the moment of use. If the paper is stored in a non-air-conditioned warehouse, it is absolutely necessary to allow stabilization period in the print room before its use. We recommend converting of the paper within 12 months from manufacturing date and after this time rights of claims normally disappear.

For more information regarding the shelf life of the board please contact the local Stora Enso sales office.

Ostrołęka, 20.09.2021

Stora Enso Division Packaging Materials

Ostrołęka Mill

Edyta Gronet

Quality and R&D Manager

Disclaimer

It is the responsibility of the manufacturer of the final product/package to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application and end use. This information and its contents are subject to the following additional limitations and disclaimers:

- Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.*
- This information is only valid at the date of this letter and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.*
- This information is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- Nothing in this information shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose, (c) the use, or the suitability for use, in connection with other products or materials, or (d) the safety or legality in any use, processing and handling of our products.*
- This information forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this information.*
- No one other than the addressee may rely on this information and we assume no liability whatsoever to any third party.*
- Any reference in this document to words "we" or "us" shall mean Stora Enso Oyj and/or its affiliate(s), as applicable from time to time.*