



Declaration of Compliance

Version: 2022:1

February 16, 2022

PureFiber Guard

<i>Product description</i>	PureFiber Guard products
<i>Product code</i>	HF5103
<i>Fiber source</i>	Fresh and virgin fibers
<i>Bleaching</i>	ECF
<i>Lamination film</i>	PP/EVOH/EMA
<i>Production site</i>	Stora Enso Packaging Solutions, Formed Fiber, Hylte Mill
<i>Producer</i>	Stora Enso Packaging Solutions, Formed Fiber

Compliance with European Food Contact Legislation

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

We hereby declare that the PureFiber Guard articles comply 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** and are produced 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 article is intended to be used as a take-away tray for food and may stand in direct contact with **all kinds of foodstuffs**. The article may be used for hot-filling, heating in microwave oven at maximum 120°C and for storage at room temperature or below up to 30 days.

Formed Fiber base tray

The **formed fiber base tray** complies as applicable and under foreseeable conditions of use with

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- BfR Recommendation XXXVI/2, Paper and board

Plastic layer

These PureFiber Guard articles contain a PP/EVOH/EMA film laminated on top of a fiber tray. PP layer is intended to be in contact with food. The plastic layer in the article complies as applicable and under foreseeable conditions of use with

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- Commission Regulation (EU) 10/2011 as amended up to 2020/1245 on plastic materials and articles intended to come into contact with food*

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The overall migration tests, according to OM5 conditions (PP layer in contact with simulants), have been performed on representative samples of multi-material multi-layer structure with the relevant food simulants. The contact area to volume ratio in the migration tests was 62,5 ml/dm². The overall migration limit 10 mg/dm² stipulated in the Commission Regulation (EU) 10/2011* is not exceeded.

According to plastic film supplier, the following substances are subject to specific migration limits (SML) according to Commission Regulation (EU) Appendix I and II of 10/2011 as amended:

FCM substance number	Substance	Restriction
10120	vinyl acetate	SML = 12 mg/kg
11710	acrylic acid, methyl ester	SML(T) = 6 mg/kg exp as acrylic acid
18430	hexafluoropropylene	SML = ND (LD = 0.01mg/kg)
18820	1-Hexene	SML = 3 mg/kg
19960	maleic anhydride	SML(T) = 30 mg/kg exp as maleic acid
26140	vinylidene fluoride	SML = 5 mg/kg
34650	bis(2,4-di-tert-butylphenyl) pentaerythritol diphosphite	SML = 5 mg/kg
68320	octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	SML = 6 mg/kg
96240	zinc oxide	SML (T) = 5 mg/kg expressed as Zn
-	1 confidential additive	SML (T) = 6 mg/kg expressed as Boron
Annex II	Lithium salts	SML = 0.6 mg/kg

According to the plastic film supplier, compliance with the SMLs has been established by worst-case calculations. Specific migration of lithium to 3% acetic acid was measured at 2h, 100°C. All SMLs are within the limits stipulated in the Commission Regulation (EU) 10/2011*.

** According to Article 14 of the Commission Regulation (EU) 10/2011 the composition of each plastic layer in a multi-material multi-layer material or article shall comply with the Regulation. However, overall migration limits and specific migration limits of this Regulation do not apply to plastic layers in multi-material multi-layer materials and articles. In a multi-material multi-layer material or article, specific and overall migration limits for plastic layers and for the final material or article may be established by national law.*

The following dual-use substances are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 and, according to our supplier, may be present in the plastic layers:

Substance	E number
Silicon dioxide	E551
Calcium carbonate	E170
Talc	E553b
Acetic acid	E260
Boric acid	E284
Carbon dioxide	E290
Phosphoric acid	E338
Potassium phosphate	E340
Potassium bicarbonate	E501

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Food Contact Guideline

In the absence of harmonised measure for paper and board the *Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles* provides harmonised approach for self-regulation. Stora Enso as a company supports and operates according to the Food Contact Guideline. The document is prepared by CEPI and several packaging associations. More information on the guideline can be found on the CEPI web site <http://www.cepi.org/mediacentre/publications>.

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 articles for the substances listed below. Information below is based on information given by our chemical and plastic film suppliers.

Animal origin

We hereby confirm that additives with animal origin are not intentionally added to the articles.

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

Food allergens

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

- 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
- Mollusks and products thereof

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

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GMO

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

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

** Regulation 1831/2003 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."

Other substances

We hereby confirm that the following substances are not intentionally added to the articles:

- Azocolourants and azodyes as defined in Annex XVII of REACH
- Bisphenol A and Bisphenol S
- Epoxide derivatives (BADGE, NOGE, BFDGE), Regulation (EC) No 1895/2005
- Fluorinated chemicals including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid and its derivatives (PFAS)
- Melamine
- Natural rubber latex
- Optical brightening agents (OBAs)
- Phthalates
- Titanium dioxide

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).

Certified management systems at the production site/sites

Stora Enso Formed Fiber is certified according to ISO9001:2015

Stora Enso mill specific certificates are available at [Download centre | Stora Enso](#)

Hyltebruk, 17 February 2022

Stora Enso Formed Fiber

A handwritten signature in blue ink, appearing to read "Anette Berggren".

Anette Berggren
Senior Process & Product Engineer

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Disclaimer

It is the responsibility of the user of the finished article to ensure that all relevant regulatory and legislative requirements, specifications and limitations in the intended application are met. This Declaration of Compliance 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 Declaration of Compliance is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.*
- *This Declaration of Compliance is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- *Nothing in this Declaration of Compliance 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 Declaration of Compliance 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 Declaration of Compliance.*
- *No one other than the addressee may rely on this Declaration of Compliance and we assume no liability whatsoever to any third party.*

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