

Declaration of Compliance

Cupforma Natura BIO and Cupforma Natura 2BIO

<i>Trade name</i>	Cupforma Natura BIO and Cupforma Natura 2BIO (hereafter referred to as the extrusion coated paperboard)
<i>Product code</i>	PE317 and PE318
<i>Product description</i>	Bleached cup board with BIO coating
<i>Baseboard grammage</i>	Ranges between 170 g/m ² to 380 g/m ²
<i>BIO coating</i>	The BIO coating is on both sides of the paperboard. This DoC covers all BIO layer grammages up to 35 g/m ² . Coating weights vary depending on specifications. For more information see technical specification.
<i>Fiber source</i>	Virgin fiber
<i>Bleaching</i>	All used pulps are elemental chlorine free (ECF-pulps)
<i>Production site</i>	Cupforma Natura is manufactured at Stora Enso Consumer Board, Imatra Mills and extrusion coated at Stora Enso Consumer Board, Skoghall Mill, Forshaga
<i>Producer</i>	Stora Enso Consumer Board, Imatra Mills

Compliance with European food contact legislation

We hereby declare that this extrusion coated paperboard before conversion 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. This extrusion coated paperboard is 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 extrusion coated paperboard is intended for packaging dry, aqueous, acidic, low alcoholic and fatty foodstuffs.

This extrusion coated paperboard is intended for use under the following conditions of temperature and time.

- Freezer/fridge
- Room temperature (up to 40°C for more than 24 hrs)
- Hot-fill *

* "hot-fill" means the filling of any article with a food with a temperature not exceeding 100 °C at the moment of filling, after which the food cools down to 50 °C or below within 60 minutes, or to 30 °C or below within 150 minutes.

This extrusion coated paperboard is not intended for use under the following conditions and temperatures.

- microwave oven
- Conventional oven

NOTE!

For questions regarding if a specific end-use (food type and/or conditions) is covered by this declaration please contact your local sales office for more information. Please note that safe and appropriate use in this context means product safety. There might be technical limitations that the converter needs to take into account and test separately before use.

When converting this paperboard each part of the converting chain is responsible for the suitability for the intended end-use.

Paperboard

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

The **paperboard** complies where 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, Paper and board (2017)

Information is based on the written confirmation of our suppliers and analysis performed on representative paperboard samples.

Plastic layer

All the raw materials used in the extrusion coating comply with the relevant requirements 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 by 2018/79 on plastic materials and articles intended to come into contact with food.

Information is based on the written confirmation of our suppliers of raw materials for the plastic layer and analysis performed on the extrusion coated paperboard.

SML's – plastic layer

Substances used in the extrusion coating may contain the following monomers, other starting substances, macromolecules obtained from microbial fermentation, additives or polymer production aids with specific migration limit (SML) according to Commission Regulation (EU) 10/2011:

Substance	CAS number	Specific migration limit, SML (mg/kg food)
Hexamethylenediisocyanate	822-06-0	1 mg/kg in final product expressed as isocyanate moiety
1,4-Butanediol	110-63-4	5 mg/kg
Terephthalic acid	100-21-0	7,5 mg/kg
Tetrahydrofuran	109-99-9	0,6 mg/kg

Dual Use Additives - plastic layer

The following additives 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 **substances used in the extrusion coating**:

Substance	E number
Lactic acid	E 270

Analyses / Migration tests according to Commission Regulation (EU) 10/2011*

The overall migration tests have been performed on representative samples of **the plastic layer** of multi-material multi-layer structure according to applicable EN 1186 standards with the following results. The overall migration limit 10 mg/dm² stipulated in the Commission Regulation (EU) 10/2011* is not exceeded.

Simulant	Contact time	Temperature (°C)	Results (mg/ dm ²)
3% Acetic acid	10 days	40°C	< 10
95% Ethanol	10 days	40°C	< 10
Iso-octane	2 days	20°C	< 10

Compliance with SML limitations has been shown by worst case calculations based on the assumption that 1 kg food would be in contact with 6 dm² of paperboard. The specific migration limits stipulated in the Commission Regulation (EU) 10/2011* are not exceeded.

** According to Article 14 of the Commission Regulation (EU) 10/2011: In a multi-material multi-layer material or article, the composition of each plastic layer shall comply with this Regulation. 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.*

Industry Guideline

The *Industry Guideline 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 Industry Guideline. More information on the guideline can be found on the following web site;
<http://www.cepi.org/mediacentre/publications>

Compliance with US food contact legislation

Cupforma Natura BIO and Cupforma Natura 2BIO are polymer coated paperboards. Based on the FDA compliance information available for each layer, Stora Enso has determined that Cupforma Natura BIO and Cupforma Natura 2BIO comply with the Federal Food, Drug and Cosmetic Act and applicable food additive regulations for use in contact with the food types I, II, III, IV A-B, V, VII A-B, VIII and IX under conditions of use C through G and with food types VI A-C under conditions of use D through G as described in tables 1 and 2 of 21 C.F.R. §176.170.

NOTE!

Please note that safe and appropriate use in this context means product safety. There might be technical limitations that the converter needs to take into account and test separately before use. When converting this paperboard each part of the converting chain is responsible for the suitability for the intended end-use.

Analyses / paperboard

Please note that the following information is applicable **only for the paperboard layer** in this multi-material multi-layer structure.

Compliance with BfR Recommendation XXXVI

The paperboard complies with the requirements in BfR Recommendation XXXVI, Paper and Board 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

Chloropropanols:

1,3-DCP < 2 µg/l in the hot water extract of the paperboard
3-MCPD < 12 µg/l in the hot water extract of the paperboard

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

Optical brightening agents: Optical brightening agents, OBAs, are not used as raw material or intentionally added in the production of paperboard. Analysis has been performed according to EN 648. There was no visible transfer (grade 5) for any of the test fluids.

Colour fastness: Analysis has been performed according to EN 646. There was no visible transfer (grade 5) for any of the test fluids.

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.

Chromium

Chromium (Cr) < 2.0 mg/kg
Chromium-VI not detectable

Dioxin in paperboard

The content of 17 2,3,7,8-substituted toxic congeners of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) and 12 dioxin like PCB's analysed in representative samples of paperboard is less than 1 ppt WHO-TEQ.

PCB

Analyses have been performed on representative paperboard samples for polychlorinated biphenyls (PCB) according to EN ISO 15318. The amount of PCB is below < 2.0 mg/kg.

PCP

Analysis has been performed on representative paperboard sample for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP is < 0.1 mg/kg.

Substances / extrusion coated paperboard

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 extrusion coated paperboard for the substances listed below. Information below is based on information given by our chemical and polymer suppliers.

Animal origin

Based on the information received from our chemical and polymer suppliers all chemical additives and most of the polymers used in the production are not from animal origin. However, polymer used in the plastic coating may contain components which are produced by the ingredients derived from animal origin. These components are treated at high temperatures and undergo chemical reactions, which exceed the requirements in EMEA/410/01 Rev 03 as well as Directive 2000/6/EG Annex II.

BSE

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

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 in the manufacture of extrusion coated paperboard:

- 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 the Regulation (EU) No 1169/2011 Annex II

According to Commission Regulation (EC) No 41/2009 foodstuffs may be sold as 'gluten-free' if the gluten content does not exceed 20 mg/kg in the food as sold to the final consumer. Some starches used in the production of paperboard contain minor amounts of gluten. Based on the worst case calculations the gluten content of paperboard does not exceed 20 mg/kg and thus laminated paperboard is also considered as "gluten-free".

Phthalates

We hereby confirm that no phthalates are intentionally added in the production of extrusion coated paperboard.

Bisphenol A

We hereby confirm that no bisphenol A is intentionally added in the production of extrusion coated paperboard.

Additional legislation and regulations, not food related

Packaging and Packaging Waste Directive

The **extrusion coated paperboard** complies with the Packaging and Packaging Waste directive 94/62/EC as amended.

- The sum of lead, cadmium, mercury and hexavalent chromium in the paperboard is less than 100 ppm (EN 13428).
- The level of substances hazardous* to the environment in the paperboard is less than 0,1% (EN 13428).

* Requirements for classification of substances or preparations dangerous to the environment and assigned the hazard statements H400, H410 and H411 according to the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

The extrusion coated paperboard is suitable for recovery by ;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)
- Composting and biodegradation (EN 13432), certified by AIB-Vincotte*, certification number O 16-2144-A:
<http://okcompost.be/en/certified-products/>

Note: A material being recoverable by a certain method does not guarantee that the finished packaging can be recovered using this method.

* A finished product made of an OK compost certified intermediate material like the Cupforma Natura BIO and Cupforma Natura 2BIO, does not automatically comply with the requirements of the OK compost test program. Because of the other unknown components that can be added to the finished product (ink, reinforcement path, glue etc.), this **finished product** needs to be submitted to OK compost certification in order to have the permission to put the OK compost mark on this finished product.

REACH Regulation (EC) 1907/2006

Stora Enso's obligations under REACH are as a manufacturer of articles and substances and as a downstream user.

Where REACH demands registration we have done or will do the registration. Our paper and board grades are defined as articles without intended release with the consequence that no registration is required. Cellulose pulp is defined as a substance and exempted from registration according to annex IV.

We have included REACH demands in our purchasing agreements to secure information exchange in the supply chain. Our chemical suppliers shall continuously follow 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).
- Substances included in Annex XVII, Restrictions, where the restriction is applicable on our use.

Certified management systems at the production site/sites

Certificates are available on the internet: <http://www.storaenso.com/rethink/responsibility/certificates>

Paperboard production

ISO 9001
 ISO 14001
 ISO 50001
 OHSAS 18001
 FSSC 22000

Polymer coating

ISO 9001
 ISO 14001
 ISO 50001
 OHSAS 18001
 FSSC 22000
 FDA/IMS Packaging Certification <https://www.accessdata.fda.gov/scripts/ims/mkex/ims/ims-fr.cfm>

FSC® CoC
 PEFC CoC

FSC® CoC
 PEFC CoC

FSC® trademark license code: FSC®-C105192 PEFC™ logo license registration number: PEFC/02-31-71

Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 50-55 % relative humidity and 20-23° C. We recommend converting of the paperboard within 12 months from manufacturing date and after this time rights of claims normally disappear.

For uncertainties regarding the shelf life of the board please contact your local sales office.

Imatra, 13 July 2018

Stora Enso Consumer Board
 Imatra Mills



Aino Nurmi
 Product Safety Manager

Disclaimer

It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application. This certificate 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 certificate 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 certificate is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- *Nothing in this certificate 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 (e) the safety or legality in any use, processing and handling of our products.*
- *This certificate 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 certificate.*
- *No one other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party*