

Declaration of Compliance

<i>Trade name</i>	Triplex Gris (hereafter referred to as paperboard)
<i>Product description</i>	Recycled board
<i>grammage</i>	Ranges between 250 g/m ² to 450 g/m ² For more information see technical specification.
<i>Fiber source</i>	Recycled and virgin fibers
<i>Production site</i>	Barcelona Mill
<i>Producer</i>	RdM Barcelona Cartonboard, S.A.U.

Instructions for safe and appropriate use

This recycled board grade is intended for packaging food, for secondary packaging and packaging applications involving direct contact with dry, non-fatty foodstuffs.

When packing dry foodstuffs with large surface is recommended an appropriate intermediate packaging.

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

The information given in this certificate is based upon written confirmation from our chemical suppliers as well as analysis performed on representative board samples.

Compliance with European food contact legislation

RdM Barcelona Cartonboard grades are manufactured mainly from recycled fibers and only 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.

All chemical additives used as raw materials in the manufacturing of the paperboard are mentioned where applicable in the following regulations. Information below is based on the written confirmation of our suppliers and analysis performed on representative board samples.

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
- BfR Recommendation XXXVI, Paper and board with limitations mentioned in Instructions for safe and appropriate use.

The paperboard is produced in accordance with Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

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. RdM Barcelona Cartonboard operates according to the Industry Guideline.

Analyses

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 ⁽¹⁾

Cadmium (Cd) < 5 µg/l (in cold water extract of the product)
Lead (Pb) < 10 µg/l (in cold water extract of the product)

Hemmhof test: Analysis has been performed according to EN 1104. Transfer of antimicrobial constituents was not detected. We do not add surface biocides on top of the paperboard.

Benzophenone: Determination has been performed according to SOP 160.200. not detectable (< 0,02 mg/dm² of the product)= The amount is < 0,6 mg/kg into food stuff).

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

Pentachlorophenol (PCP)⁽²⁾: Analysis has been performed according to EN ISO 15320. The amount of PCP is < 0.1 mg/kg of the product.

Diisopropylnaphthalene: Determination has been performed according to SOP 160.200. not detectable (< 0,05 mg/dm² of the product)

⁽¹⁾ Testing and limits only apply for paper and board intended for used with moist and fatty foodstuffs

⁽²⁾ No restrictions for this substance in the Recommendation XXXVI

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 paperboard for the substances listed below. Information below is based upon 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 production paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination**.

* 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 additive of animal origin is intentionally added in the production of paperboard.

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 paperboard.

Food allergens

We hereby confirm that, with reference to the Regulation (EU) No 1169/2011 Annex II, the following food allergens or products derived thereof are not intentionally added for the manufacture of paperboard:

- 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

Phthalates

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

Bisphenol A

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

Additional legislation and regulations, not food related

Packaging and Packaging Waste Directive

The **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 symbol "N" according to Directive 67/548/EC (Directive on Dangerous Substances) and its amendments or Directive 99/45/EC (Directive on Dangerous Preparations) and its amendments, and according to corresponding classification in the new Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).*

The paperboard is suitable for recovery by ;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)

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

REACH Regulation (EC) 907/2006

Our 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 > 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

Paperboard production

ISO 9001
ISO 14001
ISO 22000
OHSAS 18001
FSC® CoC

FSC® trademark license code: FSC® C127362

Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor under normal conditions and good protection, sheltered from rain and snow. 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.

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 RdM Barcelona Cartonboard.*
- *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.*

Castellbisbal, 21 January 2020

RdM Barcelona Cartonboard, S.A.U.



Núria Ayats
Sustainability Manager