

Declaration of Compliance

Version: 2021:1

Ensocoat™

Trade name	Ensocoat (hereafter referred to as the product)
Product description	Fully coated multilayer SBS board with light coated reverse
Product code	KP271
Grammage	Ranges between 180 g/m ² to 380 g/m ² For more information see technical specification.
Fiber source	Fresh and virgin fiber
Bleaching	All used pulps are elemental chlorine free (ECF-pulps)
Production site	Ensocoat is manufactured at Stora Enso Division Packaging Materials, Imatra Mills
Producer	Stora Enso Division Packaging Materials, Imatra Mills

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 and 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 (2019). 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 and fatty foodstuffs.

This product 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)

This product is not intended for use under the following conditions and temperatures.

- Hot-fill
- De-freezing and/or re-heating of food (e.g. ready meals) in microwave oven**

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- Conventional oven

Please also see storage conditions.

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

Migration of Aluminium (Al) to fatty foodstuff is ≤ 1 mg/kg.

Formaldehyde: Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1.0 mg/dm².

Optical brightening agents:

Optical brightening agents, OBAs, are used in the manufacturing of paperboard. Analysis has been performed according to EN 648 under test conditions A. There was no visible transfer (grade 5) with olive oil simulant.

Colour fastness: Analysis has been performed according to EN 646 under test conditions A. 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.

Other heavy metals

Chromium VI < 0.25 mg/kg
Mercury (Hg) < 0.3 mg/kg

Nickel < 2.0 mg/dm² as required in Finnish KTM decree 268/1992
Chromium < 2.0 mg/dm² as required in Finnish KTM decree 268/1992
Lead < 0.50 mg/dm² as required in Finnish KTM decree 268/1992
Cadmium < 0.10 mg/dm² as required in Finnish KTM decree 268/1992

Compliance with US food contact legislation, FDA



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Information given in this declaration is based on our current knowledge and written confirmation from our chemical suppliers as well as analysis performed on representative product 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 the food types V, VII A, VIII and IX under the conditions of use E, F and G as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this product is compliant as food packaging material used in contact with infant* formula or human milk only with a proper functional barrier.

* The term "infant" refers to individuals aged 0- 6 months and "Infant food" is limited to infant formula and human milk. For more information please check with FDA Guidance on "Preparation of Food Contact Notifications for Food Contact Substances in Contact with Infant Formula and/or Human Milk". <https://www.fda.gov/media/124714/download>

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**.

* 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."

Animal origin

We hereby confirm that no additive of animal origin is 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 is intentionally added in the manufacturing of the product.

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

Food allergens

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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 as amended, the following food allergens or products derived thereof are not intentionally added for the manufacturing of product:

- 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*

Wheat and/or barley starches used in the manufacturing of product contain minor amounts of gluten. According to Commission Regulation (EC) No 828/2014 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. Based on the worst-case calculations the gluten content of product does not exceed 20 mg/kg and thus product is also considered as "gluten-free".

EN 71-3 Safety of toys – Part 3: Migration of certain elements

We hereby confirm that product, before further converting, comply with the requirements of EN 71-3:2019 Safety of toys – Part 3: Migration of certain elements.

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 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).

Certified management systems at the production site/sites

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

Paperboard production

ISO 9001

ISO 14001

ISO 22000

FSSC 22000

ISO 45001

ISO 50001

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 product 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.

Imatra, 09 May 2021

Stora Enso Division Packaging Materials

Imatra Mills



Aino Nurmi

Product Safety Manager

Disclaimer

It is the responsibility of the manufacturer of the finished articles 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 declaration 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 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.*



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- *This declaration 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 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 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.*
- *No one other than the addressee may rely on this declaration and we assume no liability whatsoever to any third party*