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## Declaration of Conformity, PankaKraft Polar and PankaKraft Amber

**PankaKraft Polar and PankaKraft Amber** produced by Pankakoski Mill Oy are manufactured solely from virgin fibers and additives. The middle layer of the board consists of unbleached mechanical pulp, whereas the top and back layers are made with elementally chlorine free (ECF) bleached and/or unbleached chemical pulp.

All the raw materials used in board production are approved for food contact and possible health risks have been considered in those approvals.

No optical brightening agents (OBA) are used in the production of **PankaKraft products**.

**PankaKraft products**, in respect of chemical composition, are suitable as packaging material for both dry and non-fatty foods as well as moist and fatty foods. When packing aqueous and fatty foods we recommend a functional barrier between the food and board although a direct contact is allowed.

**PankaKraft products** are suitable for packing both hot and cold food which may be dry, moist, acid, fatty and sweet.

**PankaKraft products** can safely be used as packaging material at temperatures of -30 °C ... +90 °C (holding and reheating of food). This is based on the latest version of BfR XXXVI Recommendation for Paper and Board for Food Contact.

**PankaKraft products** are suitable for packaging of frozen or chilled products, as they are always hard sized to minimize moisture absorption of the board when packed product is thawed. Defrosting does not impact the food safety of the board.

### General legislation requirements

**PankaKraft products** are in compliance with the requirements of following laws, regulations and recommendations:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food
- European Parliament and Council Directive 94/62/EC
- European Parliament and Council Directive 2018/852
- The European Parliament and the Council of the European Union Regulation (EC) 2023/2006 on good manufacturing practice for materials & articles intended to come into contact with food
- Law Concerning Foodstuffs, Consumer Goods and Animal Feed Code (LFGB) in the version of the notification of 15 September 2021 (BGBl. I. p. 4253), last amendment 27 September 2021, (BGBl. I. p. 4530), §§ 30 and 31
- German Recommendation BfR no. XXXVI, state of 1.2.2023. In terms of its chemical composition, the Product represented by the samples tested is suitable as food contact material for both dry and non-fatty foods as well as moist and fatty foods at temperatures up to 90 °C.

- Based on Regulation (EU) 2019/515 on the mutual recognition of goods lawfully marketed in another Member State, product fulfills requirements for materials and articles intended to come into contact with food in all EU countries
- FDA regulations, 21 CFR, part 170-189, 1<sup>st</sup> April 2023, USA, with limitations: In terms of its chemical composition, the Product grade represented by the samples tested may be use in contact with food types I, II, III, IVA, IVB, V, VIA, VIB, VIIA, VIIB, VIII, IX, which are listed in Table 21 CFR 176.170 ® ) at room temperatures or below, no thermal treatment in the container.
- Model Toxics Legislation as developed by source reduction council of CONEG
- DIN EN 71-3:2019 + A1:2021 Safety of Toys: Migration of Certain Elements
- DIN EN 71-9:2008 Safety of Toys: Organic chemical compounds
- DIN EN 71-10:2005 Safety of Toys: Organic chemical compounds – Sample preparation end extraction
- DIN EN 71-11:2005 Safety of Toys: Organic chemical compounds – Methods of analysis
- Council of Europe resolution AP (2002) (CoE) on paper and board used in food contact
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council (18.12.2006) concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- Regulation SR 817.023.21 of the EDI on Materials and Articles Intended to Come into Contact with Foodstuff (incl. Section 9, Article 27)
- The French General Directorate for Competition Policy, Consumer Affairs and Fraud Control (DGCCRF) DM/4B/COM/004 for food contact materials
- French Decree 2007-766, has been modified by Decree 1469/2008
- French Decree 2007-1467
- The Italian food contact legislation according to Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973 (last modification of 31 May 2016) for paper and board intended to come into contact with dry, moist and fatty foodstuffs

### **Packaging Requirements**

To meet the basic requirements of EU Directive 94/62/EC on packaging and packaging waste, European Standards EN 13427 to EN 13432 as well as CR 13965 have been issued. These standards determine the properties functional packaging must have.

**PankaKraft products** are suitable materials for functional packaging and they are in compliance with above mentioned standards EN 13428 – 13432 and CR 13695

- Good stiffness properties of PankaKraft products guarantee that the amount of needed packaging material can be reduced to minimum and yet good protective properties of the packaging can be reached. These are the properties preventing the packaging waste amounts from growing by source reduction, EN 13428.
- Heavy metal contents of PankaKraft products are in compliance with CR 13695 – as well as imposed by CONEG
- Hazardous substances contents of PankaKraft products are in compliance with EN 13428
- PankaKraft products are not meant to be reused in sense of EN 13429

- PankaKraft products are well suited for recycling and are good fiber source for paper industry using secondary fibers ie. PankaKraft products are in compliance with EN 13430
- PankaKraft products can be incinerated to recover energy amounts comparable to wood and in that sense PankaKraft products are in compliance with EN 13431
- PankaKraft products consist mainly of naturally occurring raw materials: more than 50% of its contents are of organic material. Based on these facts PankaKraft products are biodegradable and can be composted
  - Above mentioned products fulfill the criteria for compostability according to EN 13432 with regard to the chemical characterization, but the criterion for practical compostability (disintegration) is not entirely met after the specified test period of 12 weeks.

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