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Declaration of Compliance

Products:

thinbarrier® eco M-2S-WS 10004085, 26 g
thinbarrier® eco M-2S-WS 10003899, 30 g
thinbarrier® eco M-2S-WS 10004180, 33 g
thinbarrier® eco M-2S-WS 10003983, 38 g
thinbarrier® eco M-2S-WS 10004182, 45 g
thinbarrier® eco L-2S-WS 10004138, 26 g
thinbarrier® eco M-2S-WS nature 10003999, 26 g
thinbarrier® eco M-2S-WS nature 10004000, 30 g
thinbarrier® eco M-2S-WS nature 10004212, 33g
thinbarrier® eco M-2S-WS nature 10004094, 38 g
thinbarrier® eco M-2S-WS nature 10004095, 45 g
thinbarrier® eco M-2S-WS mocca 10004471, 33g

Date: 14.08.2024

Valid: 08.08.2026

Manufacturer: Tervakoski Oy

Version: Vr 3.0

General Compliance

Tervakoski Oy is certified according to the standards ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018 and ISO22000:2018. Certificates available upon request.

Food Contact Safety and Compliance

Food Safety Management System

Tervakoski Oy is certified according to the standards ISO 9001:2015 and ISO22000:2018. Paper machine 11 is also certified according to the FSSC 22000 requirements (Version 5.1).

Note: The Integrated management system based on the standards of ISO 9001:2015 and ISO22000 and incorporated elements ensure the compliance with Commission Regulation (EC) No 2023/2006 of 22nd of December 2006 amended, on good manufacturing practices for materials and articles intended to come into contact with food.



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Intended use and conditions of use

Products may be used safely for food packaging at temperatures up to 90°C. They may stand in direct contact with dry, moist and fatty foodstuffs. Possible limitations are described below the applicable law and regulation in question.

The products are in compliance according to laws and regulations listed below:

- Commission Regulation (EC) No 2023/2006 of 22nd of December 2006 amended, on good manufacturing practices for materials and articles intended to come into contact with food
- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27th of October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, Official Journal of the European Union L338/4 of 13th of November 2004, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, article 3, 1. (a), (b) and (c)
- Council of Europe Resolution CM/res(2020)9 on the safety and quality of materials and articles for contact with food of 7 October 2020, sections 3.1 and 3.3
- Technical guide on paper and board used in food contact materials and articles, as of 2021
- Directive 94/62/EC of the European Parliament and of the Council of 20th of December 1994, on packaging and packaging waste, Official Journal of the European Communities L365/10 of 31st of December 1994, last amendment by the Directive 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L150/141 of 14th of June 2018, regarding heavy metal contents
- German recommendation XXXVI, paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14(1971) 83, last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024
- Statutory Instruments 2012 No. 2619 Materials and Articles in Contact with Food (England) Regulations 2012 (state of 1 October 2023), Part 2, Section 4 (1)
- Scottish Statutory Instruments 2012 No. 318 Materials and Articles in Contact with Food (Scotland) Regulations 2012 (state on 1 October 2023), Part 2, Section 4 (1)
- Welsh Statutory Instruments 2012 No. 2705 (W.291) Materials and Articles in Contact with Food (Wales) Regulations 2012 (state on 1 October 2023), Part 2, Section 4 (1)





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-Statutory Rules of Northern Ireland 2012 No. 384 Materials and Articles in Contact with Food Regulations (Northern Ireland) 2012 (state on 1 October 2023), Part 2, Section 4 (1)

- Foodstuffs, Consumer Goods and Animal Feed Code (LFGB) in the version of the notification of 15 September 2021 (BGBl I. p. 4253; 2022 I p.28), last amendment by article 11 of the law of 6 May 2024 (BGBl 2024 I no. 149), §§ 30 and 31

- Code of Federal Regulations, Food and Drugs (FDA) 21 CFR Ch.1, (April 1, 2024 edition), §§ 176.170 and 176.180

Products may come into contact with foodstuffs of the categories I, II, III, IV-A, IV-B, V, VII-A, VII-B, VIII and IX under condition E (Room temperature filled and stored, no thermal treatment in the container).

- Model Toxics Legislation as developed by the Source Reduction Council of CONEG of 14th of December 1989, last modification of December 2021, regarding heavy metals

- Fiche MCDA Sheet 4 (V02-01/01/2019) Food contact ability of organic materials based on plant fibres to come into contact with foodstuffs

- Decree no. 2007 – 766 of 10 May 2007 regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011 – 385 of 11 April 2011

Information on additional Food Contact Regulations

Regulation (EU) 10/2011

Above-mentioned paper grade is not subject to the Plastics Regulation (EU) 10/2011. Therefore, OML (overall migration), SML (specific migration limits) as well as testing conditions as listed in Regulation (EU) 11/2011, and subsequent amendments, do not apply to food contact materials made of paper. The product is tested for food contact application by the accredited third-party institute, ISEGA Forschungs- und Untersuchungsgesellschaft m. b. H to comply with relevant food contact laws and regulations relative to paper.

Canadian regulation for Food packaging, Food and Drug Regulations

Part B 23.001 Foods Division 23 Food Packaging Materials

In the Canadian Food and Drugs Act as well as the Regulation has no specific requirements on paper and board in contact with food and for that reason, it is considered that above mentioned laws and regulations of which this product complies, is enough prove the safety in Canada as well.





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According to Code of Federal Regulations, Food and Drugs (FDA) 21 CFR Ch.1 (7th June 2024 edition), paragraphs 176.170 and 176.180 product may come into contact with food of the categories I, II, III, IV-A, IV-B, V, VII-A, VII-B, VIII, IX under condition E.

Analysis for compliance with the demands on food contact materials

Substances	Result	Detection limit	Method
FDA 21 CFR 176.170 extraction tests		limit value for chloroform soluble portion 0,5 mg/sq inch	report 09.08.2024
Water, condition of use E	0,95 mg/sq inch		24 hours at 49 °C
Chloroform soluble portion :	not quantifiable	<0,011 mg/sq inch	
n-Heptane, condition of use E	Not quantifiable	<0,011 mg/sq inch	30 minutes at 21 °C
PCB (18, 28, 52, 101, 138, 153, 180)	Not quantifiable	<0,01 mg/kg dry matter	DIN EN ISO 15318:1999-12, report 09.08.2024
PCP	Not quantifiable	<0,01 mg/kg dry matter	DIN EN ISO 15320:2011-08, report 09.08.2024
Methanal (Formaldehyde)	Not quantifiable	<0,004 mg/g dry matter	DIN EN 1541:2001-07, report 09.08.2024
Glyoxal	0,13 mg/g dry matter	<0,005 mg/g dry matter	DIN EN 54603:2008-08, report 09.08.2024
Anthraquinone	Not quantifiable	<0,13 mg/kg dry matter	DIN CEN/TS 17630:2021-09; GCMS, 95% ethanol (v/v), report 09.08.2024
2- Ethylantraquinone	Not quantifiable	<0,13 mg/kg dry matter	DIN CEN/TS 17630:2021-09; GCMS, 95% ethanol (v/v), report 09.08.2024





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Substances	Result	Detection limit	Method
Sum C14-C40	0,2 mg/g dry matter		SOP 160.200, GC-FID, repot 09.08.2024
Dialkyl ketones	0,1 mg/g		SOP 160.200, GC-FID, repot 09.08.2024
Heavy metals after microwave disintegration Cadmium Mercury Lead Chromium Arsenic	Not quantifiable Not quantifiable Not quantifiable 1,0 mg/kg dry matter Not quantifiable	<0,5 mg/kg dry matter <0,25 mg/kg dry matter <5 mg/kg dry matter <0,1 mg/kg dry matter <2 mg/kg dry matter	AAS or ICP-OES, repot 09.08.2024
Heavy metals in the Water Extract Lead Cadmium Chromium Aluminum Nickel	Not quantifiable Not quantifiable Not quantifiable Not quantifiable Not quantifiable	<0,001 mg/l water extract <0,001 mg/l water extract <0,004 mg/l water extract <0,2 mg/l water extract <0,01 mg/l water extract	report 09.08.2024 DIN EN 12498:2019-02 (Pb, Cd, Cr) DIN EN 17917:2024-02 (Al) ICP-OES (Ni)
Lead Mercury Chromium Nickel	Not quantifiable Not quantifiable Not quantifiable Not quantifiable	<0,075 µg/g <0,025 µg/g <0,125 µg/g <0,125 µg/g	ICP-MS, ICP-OES or AAS, extract with 3% acetic acid repot 09.08.2024
PAH (polycyclic Aromatic Hydrocarbons) Naphthalene 2-Methyl naphthalene 1-Methyl naphthalene Acenaphthylene* Acenaphthene Fluorene* Phenanthrene Anthracene 2-Methyl phenanthrene Fluoranthene* Pyrene Benzo[c]phenanthrene Benzo[b]naphtho[1,2-d]thiophene Benzo[a]anthracene Triphenylene/	Not quantifiable	*0,03 mg/kg dry matter Other compounds 0,02 mg/kg dry matter	GCMS, report 09.08.2024



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Substances	Result	Detection limit	Method
/Chrysene* Benzo[b]fluoranthene Benzo[k]fluoranthene Benzo[e]pyrene Benzo[a]pyrene Perylene Indeno[1,2,3,-cd]pyrene Dibenzo[a,h]anthracene* Benzo[g,h,i]perylene			
PAA (Primary Aromatic Amines)	Not quantifiable	0,002 mg/l water extract	DIN EN 17163:2019-05, report 09.08.2024
Total fluorine (F)	Not quantifiable	< 20 mg/kg dry matter	SOP 162.200, report 09.08.2024
DCP	Not detected	< 2 µg/l water extract	LFGB § 64, method 80.56- 2:2002-09, GCMS, report 09.08.2024
MCPD	Not detected	< 2 µg/l water extract	LFGB § 64, method 80.56- 2:2002-09, GCMS, report 09.08.2024

Microbiological testing:

Microbiological purity is tested from the paper grades as random sampling four times per year. Tested microbes are at minimum total bacteria, yeasts and molds, enterobacteria and E.coli.

The transfer of antimicrobial constituent from the papers is tested (EN 1104, Hemmhof test, report 09.08.2024) and considered as not detected.



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Raw material compliance assessments

Reach

As paper is an article, Tervakoski Oy complies with EC) No 1907/2006 article 133, sub 1: Duty to communicate information on substances in articles: "Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance."

Tervakoski Oy is therefore committed to inform customers in case any of its articles would contain any substance listed in the REACH Candidate List of substances of very high concern in a concentration > 0,1 % weight by weight or substances listed in the Annex XVII, if the restriction is relevant for its article.

Pulps

Tervakoski Oy complies with Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the EU market. As well as Commission Implementing Regulation (EU) No. 607/2012 of 6 July 2012. Confirmation available upon request.

Tervakoski Oy is certified according to the standards FSC™-STD-40-004 (FSC-C023027) and PEFC ST 2002:2020. Certificates available upon request.

Pulps used for this product are sourced from FSC™(FSC-C023027), PEFC certified or controlled wood sources. Pulps are 100% virgin raw materials and are made using ECF (Elemental Chlorine Free) bleaching for chemical pulps.

Dual use substances

Dual use substances are additives that are also used as food additives and flavorings. Food additives are defined in (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives.

Possibly used dual use substances with limitations are calcium carbonate, oxidized starch, iron oxide and silicon dioxide.



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Carcinogenic, mutagenic and reprotoxic substances (CMR)

Substances which are carcinogenic, mutagenic or toxic to reproduction ('CMR'), of category 1A or 1B, in accordance with Part 3 of Annex VI to Regulation (EC) No 1272/2008 of the European Parliament and of the Council (CLP) are not intentionally added above 0,1%.

These products may contain Titanium Dioxide Cas 13463-67-7 (CMR cat.2) and Glyoxal Cas 107-22-2 (CMR cat.2) as an intentionally added substances.

Biocidal substances

Biocides used in production of above-mentioned paper grade comply with the Regulation (EU) 528/2012 and are used in accordance with BfR XXXVI. As there is no special biocide treatment applied to the product to give antimicrobial effect, it is not treated article in the sense of the Regulation (EU) 528/2012.

Mineral oils (MOSH and MOAH)

Sources of mineral oil, MOSH and MOAH, in food contact materials are considered to be mainly from residual inks and certain adhesives found in recycled fibers. Tervakoski Oy does not use any third-party pre-consumer or post-consumer recycled fibres.

Engineered nanomaterials

Engineered nanomaterial according to Regulation (EU) 2015/2283 are not intentionally added to above mentioned product. Some raw materials used in paper manufacturing may contain a share of particles in the nano range (size range 1nm – 100nm), although they are not engineered to be nanomaterials. Engineered nanomaterials (ENMs) are manufactured with particle sizes between 1 and 100 nm (nm) and are designed to have specific chemical and physical properties that are different than their conventional counterparts.

California Proposition 65

Above mentioned paper grades may contain Titanium Dioxide, which is listed in California Proposition 65 list. Additionally, some substances may be present in used raw materials and processing aids as trace level amounts. Separate statement is available on request.



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Persistent Organic Pollutants (POP) according to Regulation (EU) No. 2019/1021

Paper article mentioned above does not contain any intentionally added Persistent Organic Pollutants (POP) listed as banned or restricted under the Stockholm Convention in a concentration > 0,1 % weight by weight.

Toxic Substances Control Act (TSCA)

Paper articles used for food contact are not regulated under TSCA. When above paper is used as food contact material, it is regulated under FDA 176.170 and 176.180 and excluded from the requirements of TSCA.

Microplastics

According to Regulation (EU) 2023/2055 concerning the restriction of intentionally added synthetic polymer microparticles, microplastics are defined as particles containing a solid polymer, where $\geq 1\%$ w/w of particles have (i) all dimensions ≤ 5 mm, or (ii), a length of $0.3 \mu\text{m} \leq x \leq 15$ mm and length to diameter ratio of >3 .

Synthetic polymers are typically used in the paper industry as additives or production aids (like sizing agents, retention aids, wet strength agents etc) to be able to deliver functional paper properties as well as maintain a consistent production process.

According to paragraph 5 in Annex of Commission Regulation (EU) 2023/2055, paragraph 1 shall not apply to the placing on the market of synthetic polymer microparticles, as substances on their own or in mixtures if synthetic polymer microparticles are permanently incorporated into a solid matrix during intended end use. Products to be regarded as articles under REACH are exempted from the regulation. According to REACH regulation, paper is an article, and therefore, restriction does not apply to paper articles.

Halal/Kosher

Above mentioned products thinbarrier® eco M-2S-WS and thinbarrier® eco M-2S-WS nature are Kosher Pareve certified by Star-K Kosher Certification. Certificate available on request.

Substances originating from animals or ethanol are not intentionally added during the paper making process.



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Substance assessment

Based on recipe assessment and supporting information obtained from suppliers the following substances are considered to be not intentionally added:

Alkyl phenols and alkylphenol ethoxylates

Allergens defined in regulation (EU) No 1169/2011 Annex II (Including Gluten). However, Sulphur dioxide (SO₂) and Sulphites (SO₃) are used in Sulphate/Sulphite pulping processes. *

Allergens defined in Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA)

Asbestos

Azo dyes

Bisphenol A, B, F, S and AF

Endocrine disrupting compounds (EDC) as listed in United Nations identified 45 EDSs

Ethanol

Genetically modified organisms (GMO)

Latex

Optical brighteners (OBA)

Per- and polyfluoroalkyl substances (PFAS, incl. PFOS, PFOA)

Phthalates

Post consumer recycled raw materials

PVC, PVDC

Substances of animal origin

Substances of very high concern (SVHC) above the threshold limit < 0,1 % w/w

* Based on theoretical calculations (using 1 kg food equals 6dm² packaging), the limit 10 mg/kg for food will not be exceeded.

Circular Economy and End of Life Status

Recyclability

The product is recyclable, in its original form when leaving the mill, if the local appropriate collection and sorting is organized and the local appropriate infrastructure exist. The product conforms to Directive 94/62/EC on packaging and packaging waste concerning heavy metals. Product in its original form can be recycled under the suitable grade definition as defined in European list of Standard Grades of Paper and Board for Recycling, standard EN643.

Based on the 4 evergreen Circularity by Design Guideline (vr. 2, June 2023, table 4.), above mentioned product does not contain raw materials which would not be fully or conditionally compatible with standard recycling process.



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Based on the Aticelca® 501:2019 test, thinbarrier® eco M-2S-WS and thinbarrier® eco M-2S-WS nature are recyclable with paper level C.

Level C (Aticelca® 501): the sample can be recycled with paper both efficiently and economically using widespread present-day technology. The sample can be recycled in industrial plants which treat waste of ordinary grades and even waste from urban waste collection once the standard recycling process has been adapted. The recycled sample produces less than 40% waste and/or a significant contribution of adhesive particles or cellulose fiber flakes.

Western Michigan recyclability test:

- thinbarrier® eco M-2S-WS 26 gsm, repulpability process, part 1, test result passed
- thinbarrier® eco M-2S-WS mocca 33 gsm, repulpability process, part 1, test result passed

Compostability and Biodegradability

The Compost Manufacturing Alliance In-Vessel (CMA-I): thinbarrier® eco M-2S-WS and thinbarrier® eco M-2S-WS nature have been certified through CMA for CMA In-Vessel Covered facilities.

ASTM 6868-19: thinbarrier® eco M-2S-WS (45 gsm) and thinbarrier® eco M-2S-WS nature (45 gsm) meet the requirements to be considered "compostable" as judged by ASTM D6868-19.

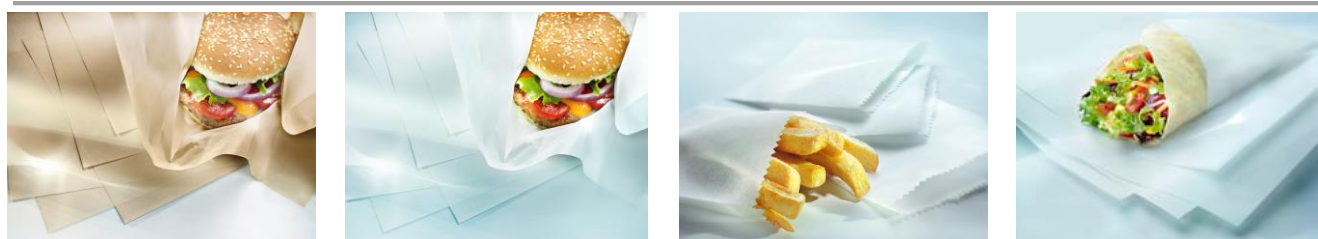
TÜV Austria: OK compost HOME and OK compost INDUSTRIAL thinbarrier® eco M-2S-WS (maximum grammage 38 gsm) and thinbarrier® eco M-2S-WS nature (maximum grammage 45 gsm) have been certified through TÜV Austria for compostability at home as well as under industrial conditions. Certificates available upon request.

Other

Storage conditions and shelf life:

Products have a shelf life with applicable paper properties and food contact safety of about 2 years from packing date if the product is stored in its original package in clean and dry environment and not in direct sunlight.

Products must be stored wrapped to avoid odor, dust, moisture, and direct sun. The general optimum conditions for the storage area of papers are at relative humidity 45-55% and the temperature around 22-24°C (71-76°F)



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and any contamination of the product must be avoided. However, Tervakoski Oy does not specifically analyze for the shelf life of the articles. Therefore, any exact shelf life of the products cannot be guaranteed.

Validity of this document:

This document – Declaration of Compliance - is valid for the date given. If it proves to be necessary to renew it based on the test results, raw material changes or similar reason, it can be renewed before the expiring date. The newer version is always the valid version. Document is valid without signature.

Disclaimer:

To the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. The legislation cited above applies to the specified paper product as it leaves production. It is the customers responsibility to verify compliance with any and all relevant regulatory and legislative requirements and specifications of the consumer end- product under the actual and foreseeable conditions of use.

Intentionally added shall mean deliberately utilized in the formulation of material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Based on reasonable investigations, the information set out herein is accurate to our current knowledge only and not all the information and requirements listed above are checked with all raw material suppliers. 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. Please note that analyses are only made on representative paper samples and not all substances are measured.

Nothing in this certificate shall be interpreted as a warranty or guaranty (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. No one other than the addressee may rely on this certificate, and we assume no liability whatsoever to any third party. This certificate is only valid to the extent it has been delivered by an authorized employee of delfort group. It is the responsibility of the converter or food packer to control that the final consumer product complies with the requirements of the intended and foreseeable conditions of use.



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