

1st September, 2022

PRODUCT SAFETY STATEMENT

ALASKA® BRIGHT FOLDING BOXBOARD PRODUCTS

are manufactured in compliance with Commission Regulation (EC) No 2023/2006 good manufacturing practice for materials intended to come into contact with food and quality management system certified according to ISO 9001 and ISO 22000.

When converting these paperboards each part of the converting chain is responsible of the suitability for the intended end-use. Converter needs to take into account and test possible limitations of the product before use.

This document adds up the written information from our suppliers, analysis performed on representative paperboard samples and the certificate of compliance given by accredited independent research laboratory.

FOOD CONTACT

Declaration of Compliance

- European Parliament and Council Regulation (EC) 1935/2004/EC
- BfR recommendation no. XXXVI, 1 April 2022, Germany
 - Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 225th Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April. The board may be used safely for food packaging in direct contact with dry and fatty foodstuffs at temperatures up to 90°C.
- FDA regulations, 21 CFR Ch. I, parts 176.170 and 176.180, 1 April 2021, USA
 - The board may be used safely for food packaging in direct contact with dry and fatty food types at hot sterilization, temperatures up to 121°C.

The recommendation requirements in force at the manufacturing date of product has been followed.

Compliance of specific board delivery is confirmed by corresponding order data and/or by product labelling.

The appropriate handling and storage conditions (in RH50%, 23°C) of product shall be utilized to ensure the safe use. We recommend converting of the paperboard within twelve months from manufacturing date.



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COMPLIANCE TO

- Foodstuffs, consumer Goods and Animal Feed Code-LFGB in the version of the notification of 15th of September 2021 (BGBl. I S. 4253), last amendment article 7 of the law of 27 September 2021 (BGBl. I p.45,0), §§ 30 and 31
- French demands of the Degree no. 2007-766, 10 May 2007. The suitability of ALSKA® Bright board to come into contact with food regarding the application of the consumer law, which concerns metals and articles intended for food contact, last amendment by decree no. 2011-385 of 1 April 2011, supersedes Decree no. 92-631 of July 1992 on materials and articles intended for contact with foodstuffs, products and drinks for men's or animals' food.
- SWISS regulation SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16. December 2016 (State on 1 July 2022), article 49, as well as of the SR 817.023.21 Ordinance of the FDHA on materials and Articles of 16 December 2016 (State on 1 December 2019), article 27.
- Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, Official Journal of the European Union L 174/88 of 1 July 2011, last amendment by Directive (EU) 2021/1980 of the Commission of 11 August 2021, Official Journal of the European Union L 402/73 of 15 November 2021, regarding the content of polybrominated bisphenyls, polybrominated diphenyl ethers and heavy metals.
- EN 71 part 3:2021 Safety of Toys: Migration of certain elements
- EN 71 part 9:2007 Safety of Toys: Organic chemical compounds
- EN 71 part 10-11:2006 Safety of Toys: Organic chemical compounds
- Regulation EC 94/62 Packaging and Packaging Waste directive and the latest amendment concerning metals
- Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008.
- PTS Method RH: 021/97. In view of the test results and based on the criteria of PTS Method RH: 021/97, the material is rated as recyclable and repulpable.

have been confirmed by accredited laboratories.

- MM Kotkamills Boards Oy operates according to the Industry Guideline for the Compliance of paper and board materials and articles for food contact. More information on the guideline can be found on the following web site; <http://www.cepi.org/mediacentre/publications>

RAW MATERIALS

FIBRES

All the fibers used in board products are covered by CoC certifications and the obligations of the European Union Timber Regulation (EU TR 995/2010) and Due Diligence System (DDS).

Our board products are manufactured from 100% virgin forest fibres.

Main Species are Pine (Pinus Sylvestris), Spruce (Picea Abies), Birch (Betula spp).



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Absence of recycled fiber excludes the possible risk from non-intentionally added substances (NIAS) and traces of printing inks or mineral oils.

The pulps used in MM Kotkamills' boards are;

- CTMP from chlorine free bleaching process
- Elemental chlorine free (ECF) chemical pulps

Mineral oil (MOSH/MOAH)

Mineral oils typically originate from recycled fiber material and inks. MM Kotkamills Oy's board contain only virgin fibres avoiding the topic of harmful mineral oils. Mineral oils are not added or used as raw materials in the manufacturing of this product.

OTHER RAW MATERIALS

Reach

Our paper and board grades are defined as articles. Thus, registration doesn't apply for our paper and board grades.

All chemicals and additives used by MM Kotkamills Boards Oy as downstream user fulfill the REACH requirements. We do not intentionally add any substances containing above 0.1% (W/W) of Substance of Very High Concern (SVHC) that will be published on the Candidate list. We continuously follow the development of the candidate list and the substances for authorization.

Food Contact Requirements

All products are regularly tested by independent third party laboratory for food contact suitability. The raw materials we use are under foreseeable conditions, and as confirmed by writing by our suppliers, approved according to the

- German recommendation XXXVI of BfR and
- USA regulations of FDA, 21 CFR, parts 170 – 189



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Dual Use Additives

Based on the information given of the raw materials and on the knowledge of the manufacturing process, the following dual use additives can be present;

Substance	E number	ADI (Acceptable Daily Intake)
Sodium nitrate	(E251)	ADI for E251-E252 3.7 mg/kg
Sodium acetate	(E262)	
Malic acid	(E296)	
Citric acid	(E330)	
Butylated hydroxytoluene	(E321)	ADI 0,3 mg/kg
Adipic acid	(E355)	ADI for E355-E357 5 mg/kg
Alginic acid	(E400)	
Xanthan gum	(E415)	
Sorbitan monostearate	(E491)	ADI for E491-E495 25 mg/kg
Sorbitan monolaurate	(E493)	ADI for E491-E495 25 mg/kg
Magnesium chloride	(E511)	
Sodium sulphate	(E514)	
Ammonium Sulphate	(E517)	
Hydroxides	(E524)	
Calcium hydroxide	(E529)	
Silicon dioxide	(E551)	
Magnesium silicate	(E553a)	
Talc	(E553b)	
Microcrystalline wax	(E905)	
Polyethylene glycol	(E1521)	ADI 10 mg/kg
Glutaral	(FL No 05.149)	
Ethyl acrylate	(FL 09.037)	

Generally Modified Organisms (GMO)

as defined by European Union are not intentionally added in the production of paperboard.

Allergens

Substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of our product.

However, raw materials may contain wheat. Based on the information given by our supplier, the gluten content of the final product does not exceed 20 mg/kg. According to "Commission Regulation (EC) No 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten" and "Food Labeling; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA" gluten free labelling for food can be used if the gluten content does not exceed 20 ppm (= 20 mg/kg).



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Animal origin

Based on the given information by our chemical suppliers, no additive of animal origin is intentionally added in the production of board.

ANALYSES

FDA-extractions

FDA Food Contact Article test in accordance with 21 CFR 176.170. The following extractions have been performed in migration cell. Chloroform soluble extractives in

- Water (2h, 121 °C)
- n-Heptane (2h, 66 °C)

Extraction with water, mg/in ² 2h, 121 °C	Extraction with chloroform, mg/in ²	Extraction with heptane, mg/in ² 2h, 66 °C
2,55	< 0,05	<0,5

Phthalates

Analysis with GC/MS from 24 hours ambient iso-octane extract gives the following results

DIBP<1 mg/kg
DBP<1 mg/kg
BBP<1 mg/kg
DNOP<1 mg/kg
DEHP<1 mg/kg
DMP<1 mg/kg

Formaldehyde

Content according to EN 1541 below the determination limit (0,004 mg/g).

Bisphenol A (BPA)

Bisphenol A is not intentionally added to the products nor detected in the analyses.

Total PCB

Content according to EN ISO 15318 is below determination limit (0,01 mg/kg)

Total PCP

Content according to EN ISO 15320 is below determination limit (0,01 mg/kg)



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Metals

Metals from cold water extract according to EN ISO 12498 and EN ISO 12497

Metal	Cadmium, Cd	Mercury, Hg	Lead, Pb	Chromium, Cr
Content	<0,001	<0,001	<0,001	<0,004
Unit	mg/l	mg/l	mg/l	mg/l

Optical Brighteners (OBA)

Optical brighteners are used to control the shade and brightness of the products. The fastness of fluorescent whitening agents is determined according to EN 648 (long duration contact) by external laboratory. The declaration of conformity of each grade is given based on these results.

CERTIFIED MANAGEMENT SYSTEMS AT THE PRODUCTION SITE

ISO 9001:2015	No. 1405
ISO 14001:2015	No. 1535
ISO 22000:2018	No. 9486
ISO 45001:2018	No. 1965
PEFC ST 2002:2013, PEFC ST 2001:2008 v2	No. 2177
FSC-STD-40-003 (2.1), FSC-STD-40-004 (3.0), FSC-STD-40-005 (3.1), FSC-STD-40-007 (2.0)	INS-COC-100038/ INS-CW-100038

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DISCLAIMER

This certificate is only valid to the extent it has been signed and delivered by an authorized employee of MM Kotkamills and based on the delivery contract between MM Kotkamills and the addressee. 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 content and the information set out herein is accurate to our current knowledge only. This information is only valid as of its date of publication or as confirmed in order documents and we assume no liability for subsequent changes in regulatory requirements, information, processes or other contents. MM Kotkamills makes no other warranty of any kind, express or implied, by contract, statute, or otherwise, and MM Kotkamills expressly excludes and disclaims all implied warranties of merchantability or fitness for a particular purpose or otherwise. Any copying, distribution, sending or publication of information in this Declaration is prohibited without prior written consent.