AP-2022-13

1st September, 2022

PRODUCT SAFETY STATEMENT

ALASKA® STRONG 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

has been confirmed by independent accredited laboratory as follows

- 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, Bundegesundheitdbatt 14 (1971) 83, last amended by 225th Announcement, Bundegesundheitsblatt 65 (2022) 525-526, as of 1 April 2022. The board may be used safely for food packaging in direct contact with dry and fatty foodstuffs, in addition the paper grade may stand in direct contact with moist foodstuffs with its uncoated back side 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 high temperatures and hot sterilization up to 121°C. It may stand in direct contact with dry and fatty foodstuffs. In addition, the paper grade may stand in direct contact with moist foodstuffs with its uncoated back side.

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.

COMPLIANCE TO

- Foodstuffs, consumer Goods and Animal Feed Code-LFGB in the version of the notification of 15th of September 2021 (BGBI I. p. 4253), last amendment by article 7 of the law of 27 September 2021 (BGPI I p. 4530), §§ 30 and 31
- French demands of the Degree no. 2007-766, 10 May 2007. The suitability of ALASKA® STRONG board to come into contact with food regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011-385 of 14 April 2011.
- 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 on the restriction of the use of certain hazardous substances in electrical and electronic equipment 8 June 2011 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,
- EN 13432 *Requirements for packaging recoverable thorough composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging state Dec. 2000*, regarding chemical characteristics, biodegradability, ecotoxicity (compost quality) and disintegration.
- 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

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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).

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 Boards 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
Xanthan gum	(E415)	
Sorbitan monolaurate	(E493)	ADI for E491-E495 25 mg/kg
Sorbitan monostearate	(E491)	ADI for E491-E495 25 mg/kg
Magnesium chloride	(E511)	
Sodium sulphate	(E514)	
Ammonium Sulphate	(E517)	
Hydroxides	(E524)	
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
2,36	< 0,05	<0,5

Migration of antimicrobial agents

Absence of inhibition zones have been confirmed by standard EN 1104 (Hemmhof-test).

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)

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) and by prEN17600 by external laboratory. The declaration of conformity of each grade is given based on these results.

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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

Johanna Mussalo
Compliance Manager

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. The 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.

Product Safety Statement

V-AST-2025-02

Company: MM BOARD & PAPER
Production Site: MM Kotkamills Oy
Product: ALASKA STRONG / Virgin Fibre Cartonboard
Revision Date / Version: 01.01.2025 / V02

Certificates of our certified management systems at the production site are available on our website: https://mm.group/board-paper/certificates/.

1. Food Contact: Declaration of Compliance

We hereby state that the above mentioned article under foreseeable conditions of intended use are compliant with the following food contact regulations and recommendations as amended. The cartonboard quality may stand with both sides of the product in direct contact with dry and greasy foodstuffs and in addition with its uncoated back side with moist foodstuffs. The cartonboard quality is intended to come in contact with food at temperatures up to 90° (holding and reheating of food). The material is not tested on suitability for higher temperatures.

EU Regulation (EC) No 1935/2004	Compliant
EU Regulation (EC) No 2023/2006	Compliant
EU Resolution CM/Res(2020)9	Compliant
Austria LMSVG	Compliant
Germany BedGgstV and LFGB	Compliant
Germany BfR Recommendation XXXVI	Compliant
France DGCCRF – Fiche MCDA n°4	None of the substances listed under 4.2 in Fiche MCDA n°4 is intentionally used. Compliance can be assumed.
Italy D.M. 21/03/1973	Product can be used in compliance with D.M. 21/03/1973.
Switzerland SR 817.02 Article 49	Compliant

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2. Additional Regulations and Guidelines:

REACH Regulation (EC) 1907/2006	No currently listed SVHC is present above the limit of 0.1 % in any of our products.
Packaging and Packaging Waste Directive 94/62/EC	Please see point 4 (heavy metals) and 6
POP Regulation (EU) 2019/1021	None of the substances listed in Annexes I to IV of this regulation is intentionally contained.
RoHS II Directive 2011/65/EC	Not applicable; RoHS II is only applicable for electric and electronic compounds.
Toys EN 71-3	Requirements on migration of certain elements are fulfilled.
California Proposition 65	The presence of minor traces of substances listed in California Proposition 65 cannot be excluded.
CEPI	As a CEPI member, we follow CEPI's Guidelines on paper and board for food contact.

3. Raw Materials

Please refer to product info sheets for product specific board structures.

Fibres	Virgin fibres
Chlorine / Bleaching	Pulp produced at MM mills are free from elementary chlorine or other chlorine compounds and can therefore be described as totally chlorine free (TCF). However, in some cases market pulp may be used for the cartonboards. This pulp is totally chlorine free (TCF) or could be elemental chlorine free (ECF), depending on availability.

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4. Substances of Concern:

Allergens	Various starches are used during the production of cartonboard. Among others, wheat starch is used, which contains gluten. Acc. to Regulation (EU) No.1169/2011 Annex II, wheat is considered as a substance that causes allergies or intolerances. However, worst-case studies conducted by independent institutes have shown that gluten is not detectable on the finished cartonboards. Therefore, a transfer of gluten from the cartonboard to the packaged food is considered extremely unlikely. Possible traces of Sulphur dioxide are far below concentrations that may cause allergies or intolerances. No other allergens according to Regulation (EU) No. 1169/2011 Annex II are intentionally contained.
Animal origin / Halal / Kosher	No animal derived raw material or potable alcohol is constitutionally contained.
Biocides / Slimicides / Preservatives	Biocides in our board qualities are exempted from the scope of Regulation (EU) No. 528/2012 according to Article 2 (5) b. Slimicides and preservatives in chemical aids used for the production or used during the production of boards fulfill applicable provisions such as those given in German BfR Recommendation XXXVI and/or other valid regulations. Cartonboard intended to come into contact with foodstuffs must have no preserving effect on the foodstuffs with which they come into contact. Tests acc. to DIN EN 1104 to determine the transfer of antimicrobial constituents are performed on a regular basis.
CMR	No CMR 1A, 1B and CMR 2 substances acc. to Regulation (EC) No 1272/2008 are intentionally added in concentrations above relevant concentration limits subject to labeling.
Conflict Minerals (3TG)	As per section 1502 of the Dodd-Frank Wall Street Reform Act no tantalum, tungsten, tin or gold is used in the production process.
Endocrine disrupting chemicals	None of the identified or potential EDSs currently listed under www.edlists.org are intentionally contained in quantities > 0.1 %.
Genetically modified organisms	No raw materials that contain genetically modified organisms (GMO) are intentionally used during the production process.
Heavy Metals	No heavy metals are intentionally added during the production process; the limit of heavy metals [Sum of Pb, Cd, Hg and Cr(VI) < 100 ppm] acc. to Directive 94/62/EC is not exceeded.
Microplastics	Microplastic particles that might be released to the environment when used in accordance with the intended use are not intentionally contained.
Mineral oil compounds	No mineral oils are intentionally used or added during the production process. Mineral oil compounds typically originate from recycled

	fiber material and inks. The above mentioned cartonboard(s) contain only virgin fibres avoiding the topic of harmful mineral oils.
Nanomaterials	No nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2022/C 229/01 are intentionally contained. Low quantities of particles in nanometer scale may be present in some of our raw materials. These particles are bound within the matrix of our cartonboard products during the production process. Therefore, these particles cannot be released and a transfer to the packed product is not to be assumed.
Not intentionally added substances (NIAS)	The NIAS levels of the following compounds are routinely monitored and lie within applicable limits: - 3-Monochlorpropane-1,2-diol, 1,3-Dichlor-2-propanol (3-MCPD, 1,3-DCP) - Bisphenol A (BPA) - Bisphenol S (BPS) - Formaldehyde - Heavy Metals - Pentachlorphenol (PCP) - Phthalates (Di-ethylhexylphthalat, Di-n-butylphthalat Di-isobutylphthalat, Di-octylphthalat, Benzylbutylphthalat, Di-methylphthalat, etc.) - Polychlorinated biphenyls (PCBs)
Optical Brighteners (OBA)	Optical brighteners are used to control the shade and brightness of cartonboard products. The above mentioned food contact suitability is given based on the results of the determination for the fastness of fluorescent whitening agents according to EN 648.
Other substances of concern	None of the following substances is intentionally added during the production process: - Alkylphenols and alkylphenol ethoxylates - Bisphenoles - Butylhydroxyanisole / Butylhydroxytoluoene (BHA, BHT) - Epoxyderivatives (BADGE, BFDGE, NOGE) - Ozone depleting substances - Parabens - Perflourinated substances (PFAS) - Polybrominated biphenyl, polybrominated diphenyl ethers (PBB, PBDE) - Polyvinyl chloride, Polyvinylidene chloride (PVC, PVdC) - Titanium dioxide

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5. Dual Use Substances:

Based on the information given from the suppliers of our raw materials and on the knowledge of the manufacturing process, the following dual use food additives and flavourings – as listed in Regulations (EC) No 1333/2008 and (EC) No 1334/2008 - may be contained:

Substance	E number
Calcium carbonate	E 170
Sodium nitrate	E 251
Acetic acid	E 260
Sodium acetates	E 262
Citric acid	E 330
Phosphoric acid	E 338
Sodium phosphates	E 339
Potassium phosphates	E 340
Calcium phosphates	E 341
Magnesium phosphates	E 343
Adipic acid	E 355
Calcium stearate	E470a
Sorbitan monolaurate	E 493
Hydrochloric acid	E 507
Magnesium chloride	E 511
Sulphuric acid	E 513

Substance	E number
Sodium sulphates	E 514
Aluminium sulphate	E 520
Sodium hydroxide	E 524
Ammonium hydroxide	E 527
Silicon dioxide	E 551
Magnesium silicate	E 553a
Talc	E 553b
Bentonite	E 558
Polyvinyl alcohol (PVA)	E 1203
Oxidised starch	E 1404
Monostarch phosphate	E 1410
Distarch phosphate	E 1412
Acetylated starch	E 1420
Propane-1, 2-diol	E 1520
Polyethylene glycol	E 1521
Cellulose	E 460

Transfer of above mentioned substances into food in relevant quantities is not to be assumed.

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6. Recyclability / Material Circulation:

MM BOARD&PAPER's cartonboards can be classified as "recyclable" within standard stock preparation of the packaging paper industry and can be used to produce new recycled paper and cartonboard products. This was demonstrated by practical tests at MM BOARD & PAPER WLC mills.

Please note that the recyclability also depends on the packaging design and construction as well as the available recycling technologies in specific regions.

We fulfil the requirements of the following harmonized CEN standards and relating CEN reports according to directive 94/62/EC:

EN 13427 (Umbrella)	Describes how to handle the series of standards and is reflected in ISO 9001 and energy management documentation.
EN 13428 (Prevention)	not applicable; relates to the final packaging
EN 13429 (Reuse)	not applicable
EN 13430 (Material recycling)	is fulfilled
EN 13431 (Energy recovery)	The product is suitable for energy recovery.
TR 13695-1 (limits of heavy metals)	The limit for Sum of Pb, Cd, Hg and Cr(VI) < 100 ppm is not exceeded.
TR 13695-2 (other noxious substances)	limits not exceeded

According to the identification system for packaging materials - pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste - the applicable code for the above mentioned quality is PAP 21.

MM BOARD&PAPER qualities mainly consist of renewable, natural raw materials such as wood fibres that are biodegradable in nature.
The currently well-known home compost standards were designed for bioplastics. They are therefore not fully applicable to paper and board, due to the different nature of the materials.

Recovered paper is a valuable resource with well-established recycling loop: Recycle it!

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Disclaimer:

The information in this document is based on written information provided by our suppliers, regular analysis of representative cartonboard samples, internal risk analysis, analytical reports and certificates of compliance given by independent accredited laboratories.

This information is only valid for the specified product under observance of the specified conditions of use. We are not liable in case the transmission of such information is subsequently omitted by the buyer. Moreover, such information will not become part of any existing or future agreement we conclude with you. In addition, any disclosure of such information to the public or third person, even partly, requires our prior written consent.

The information provided herein refers to the regulations valid at the time of issue. Future changes in legislation, manufacturing process and final intended applications cannot be taken into account. Re-issuance of the declaration is strongly recommended within 2 years.
This document does not give any comment on the technical suitability of the requisite concerned.
Storage recommendations as given in the product technical data sheet have to be observed.

This document is issued electronically.

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