PAPERBOARDS AND SPECIALTY PAPERS DIVISION

Enduring Value

Version: 3 **Date: 01st Nov 2024**

Declaration of Compliance to Regulatory Requirements for Paper and Paper Board

Trade name : INDOBARR 1 & 2 PE
Product description : Paper made from Virgin fiber
Fiber source :Virgin fiber
Bleaching :All pulps used are elementary chlorine free (ECF-pulps)
Producer :ITC Limited, Paperboards and Specialty papers Division

REMARKS:

This Compliance Certificate contains the following information about the Product

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Declaration of Compliance

PAPERBOARDS AND SPECIALTY PAPERS DIVISION

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Trade name	**INDOBARR 1 AND 2 PE** (hereafter referred to as extrusion coated board)
Product description	Folding Box Board (*Base board grammage* Ranges between 190g/m² to 450g/m²
LDPE-coating	LDPE-coating is on one or both sides of the board for 1 PE and 2PE respectively. Coating weights vary depending on specifications. For more information, see technical specification.
Fiber source	Virgin fiber
Bleaching	Pulps used are manufactured through elementary chlorine free (ECF) process
Production site	*INDOBARR* is manufactured at Unit: Bollaram
Producer	*ITC Limited, Paperboards and Specialty papers Division*

1. Specific instructions for safe and appropriate use

This extrusion coated board is intended for packaging dry, aqueous, acidic, low alcoholic < 5% (v/v) and fatty foodstuffs.

The information given in this certificate is based on written confirmations of our chemical suppliers as well as evaluations and analyses made by and the certificate of compliance given by an independent research laboratory, TUV Labs, Product Certification Services

This extrusion coated board is suitable for use under the following conditions of temperature and time. Please also see storage conditions.

- Freezer/fridge (-20°C to 5°C more than 24 hrs)
- Room temperature (up to 40°C for more than 24 hrs)

With aqueous, acidic and fatty foodstuffs at

- Hot-fill (heating up to 70°C for up to 2h or heating up to 100°C for up to 15min)

* It is the responsibility of the packer of the finished packages to ensure that the package is safe to use in the intended conditions (W/min) taking onto account all relevant information e.g. the shape and size of the package and packaged food.

2. Food contact

We hereby declare that the extrusion coated board before conversion complies where applicable and under foreseeable conditions of use with the relevant requirements of;

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

Raw materials

Paperboard

For the purpose to achieve high chemical and microbiological purity only virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conform to established technology involving the use of generally recognized chemicals. All chemical additives used as raw materials for the paperboard are mentioned in the following regulations. Information below is based on the written confirmation of our chemical suppliers and analysis performed on the paperboard.

The **paperboard** complies where applicable and under foreseeable conditions of use with;

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- German BfR Recommendation XXXVI, Paper and board (2023)
- German BfR Recommendation XXXVI/2, Paper and board (2023)
- US FDA CFR 21, §176.170: Paper and Paperboard Components (2020)
- US FDA CFR 21, §176.180: Paper and Paperboard Components (2020)
- Italian Decreto Ministeriale del 21/03/1973 Disciplina igienica degli imballaggi

Florescent whitening agent (FWAs) and Optical Brightening agents (OBA): Only approved OBAs and FWAs are used in the manufacture of the base board. Though the boards contain FWA and OBAs they do not transfer any contents to dry solid food when kept in contact with the board.

Plastic layer

All substances used as raw materials for the extrusion coating are mentioned where applicable in the following regulations. Information below is based on the written confirmation of our suppliers.

The **substances used in the extrusion coating** comply with the following regulations:

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- Commission Regulation (EU)10/2011 on plastic materials and articles intended to come into contact with food

In addition, the **PE** layer in direct contact with food complies with:

- German BfR Recommendation III Poly (Ethylene)
- US Food Contact Notification (FCN) No 549
- (EU) 1245/2020 amendment of (EU) 10/2011on Plastic material to come in contact with food

Identification of the plastic substance

Trade Name	Lotrene
Product Name	Low Density Polyethylene (LDPE)
Chemical Name	Polyethylene (polyethylene) homo-polymer
Chemical family	Polyolefin
Chemical Abstract Service (CAS) Number	9002-88-4

Specific migration limits, SML

Substances used in the extrusion coating contain the following restrictions and specifications according to Commission Regulation (EU) 10/2011. It shall be noted that according to Commission Regulation (EU) 10/2011 specific migration limits and overall migration limit do not apply to plastic layers in multi-material multi-layer materials and articles.

Substance	**CAS-number**
Polyethylene	9002-88-4

Polyethylene when used according to good manufacturing practice to fabricate articles to come in contact with food comply with the United States Food & Drugs Administration (FDA) Regulation 21 CFR Ch 1. Revised on April 1,2002 and CFR 177-1520 “OLEFIN POLYMERS”. This information is based upon information given by our chemical supplier. Although PE is highly dependent on temperature and environmental conditions, a variety of decomposition products may be present ranging from simple hydrocarbons (methane and propane) to toxic/irritating gases such as Carbon monoxide & dioxide, aldehydes and other organic vapours.

Regulatory and Ecological Information:

The PE is not biodegradable. It can be recycled using suitable technology. It doesn’t contain additive compounds of lead, cadmium and chromium. Disposal must be done in accordance with existing regulation. Land filling and incineration can be considered in most cases

Occupational Exposure Limits: There are no established limits for PE, however polyethylene dust should be treated as nuisance particulate. OSHA Permissible Exposure Limit (PEL) is 15mg/m^3 total dust and 5mg/m^3respirable dust. ACGIH Threshold Limit Value (TLV) is 10mg/m^3 total dust.

Respiratory Protection: It is not ordinarily required. (OSHA has established transitional occupational exposure limits for PE. Refer to 29 CFR 1910.1000 for these transitional limits and requirements for meeting these limits). All this information is based upon information given by our chemical suppliers

FDA-extractions

The following extractions have been performed on representative samples of **extrusion coated board** according to the FDA 21 CFR §176.170. The limit 0.5 mg/in^2stipulated in the FDA 21 CFR § 176.170 is not exceeded.

Simulant	Contact Time	Temperature	Extractives(mg/in²)
Water	2 hours	250ºF	<0.5
Water	48 hours	70ºF	<0.5
n-heptane	2 hours	150ºF	<0.5
n-heptane	30 minutes	150ºF	<0.5
n-heptane	2 hours	70ºF	<0.5
n-heptane	30 minutes	70ºF	<0.5
8% alcohol	2 hours	150ºF	<0.5
8% alcohol	48 hours	150ºF	<0.5
8% alcohol	2 hours	70ºF	<0.5
8% alcohol	48 hours	70ºF	<0.5
15% alcohol	2 hours	150ºF	<0.5
15% alcohol	48 hours	150ºF	<0.5
15% alcohol	2 hours	70ºF	<0.5
15% alcohol	48 hours	70ºF	<0.5

Analyses / Paperboard

Heavy metals in paperboard

The **extrusion coated board** complies with the requirements in BfR Empfehlungen XXXVI, Paper and Board (2023).

Cadmium (Cd)	< 0.1 mg/kg
Mercury (Hg)	< 0.1 mg/kg
Lead (Pb)	< 1 mg/kg
Arsenic	<0.1mg/kg
Antimony	<0.1mg/kg

PCP in paperboard

The **paperboard** complies with the requirements for pentachlorophenol (PCP) in BfR Empfehlungen XXXVI, Paper and Board (2023). Analyses have been performed on representative board samples for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP is < 0.15 mg/kg.

Antimicrobial test

The **paperboard** fulfils the requirements in BfR XXXVI. Determinations have been performed on representative board samples regarding the transfer of antimicrobial constituents according to EN 1104.There was no inhibition zone detected i.e there was no transfer of antimicrobial constituents. We do not add surface biocides on top of the board which can also be seen in the result.

Benzophenone in paperboard

The **paperboard** complies with the requirements for benzophenone in BfR Empfehlungen XXXVI(Annexe I). Analysis have been performed on representative board samples for benzophenone. The amount of benzophenone is < 0.1 mg/dm^2 which is the acceptable limit.

Dioxin in paperboard

The content of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) expressed in World Health Organization (WHO) and NATO/CCMS toxic equivalents in paperboard are below 1 ng/kg board. The **paperboard** does not contain “dioxin-like” coplanar polychlorinated biphenyls (PCBs) above 2 ng/kg board.

PFOA & PFOS in paperboard

We do not intentionally add PFOA or PFOS during the time of manufacturing of the paperboard. PFOA is tested as per REACH Annex XVII (effective from 2020), PFOS is tested as EU POP regulation(s), Regulation (EC) No 850/2004, which our products comply.

3. Substances / Paperboard

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 board for the substances listed below.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) in accordance with "Environmental site on GMO*" are not intentionally added in the production of board. Our suppliers can however not exclude adventitious and technically unavoidable contamination**. This information is based upon information given by our chemical suppliers.

* http://ec.europa.eu/environment/biotechnology/index_en.htm and http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/04/85&format=HTML&aged=0&language=EN&guiLanguage=en

** *Regulation 1830/2003 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 of board. This information is based upon information given by our chemical suppliers.

BSE

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and CreutzfeldtJakob Disease, JCD is intentionally added in the production of board. This information is based upon information given by our chemical suppliers.

Phthalates and other Chemicals

We hereby confirm that no phthalates are intentionally added in the production of extrusion coated board. This information is based upon information given by our chemical suppliers. There is no addition of chemicals like Bisphenol A, PVC and poly lactic acids

Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the EU Directive 2003/89/EC, the following food allergens or products derived thereof are not intentionally added for the manufacture of board:

- Cereals containing gluten and products thereof
- 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 SO_2.

Consequently, the products may reasonably be expected not to contain allergenic proteins.
This information is based upon information given by our chemical suppliers.

Mineral oil migration (MOAH and MOSH):

ITC LTD –PSPD does not guarantee any limits on MOAH (Mineral oil aromatic hydrocarbons) and MOSH **(**Mineral oil saturated hydrocarbons) in this product. It can vary from lot to lot MOAH and MOSH can penetrate and migrate to the paper boards from other sources when suitable and acceptable barrier coatings are not provided. As per latest 3rd party laboratory reports MOAH & MOSH not detected in the board.

Perfluorooctanesulfonate & Perfluorooctanoic acid (PFOS & PFOA):

No chemical with the presence of PFOAs and PFOSs are added in the manufacture of this extrusion coated board. Also, the product is tested & complies 3rd party testing as per REACH Annex XVII (Effective 2020), EU POP Regulations & Regulation (EC) No. 850/2004.

4. Additional legislation and regulations, not food related

Packaging and Packaging Waste Directive

The **extrusion coated board** complies with the Packaging and Packaging Waste directive 94/62/EC amended by 2004/12/EC.

- The sum of lead, cadmium, mercury and hexavalent chromium in the board is less than 100 ppm (EN 13428).
- The level of substances hazardous* to the environment in the board is less than 0.1 % (EN 13428).

The board is suitable for recovery by;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)

REACH (as per Jun2020 updated candidate list)

The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of properties of chemical substances. The REACH regulation gives greater responsibility to industry to manage the risks from chemicals and to provide safety information on the substances. REACH requires an extensive information exchange in the supply chain in order to fulfil all obligations.Our obligations in REACH are as a downstream user and as a manufacturer of substances and articles. To secure REACH compliance from our suppliers we have included REACH demands in our purchasing agreement. For the substances that we manufacture and where REACH demands registration we have done or we will do the registrations according to the timelines set in the REACH regulation.

Cellulose pulp is defined as a substance and exempted from registration according to appendix IV. Our paper and board grades are defined as articles without intended release according to REACH. Consequently, this means that registration doesn't apply for our paper and board grades. If any of our articles contains above 0.1% (w/w) of a **S**ubstance of **V**ery **H**igh **C**oncern that will be published on the Candidate List we will inform you as REACH requires. We continuously follow the development of the Candidate List and the substances for authorization. To our knowledge today none of our articles contain any **S**ubstance of **V**ery **H**igh **C**oncern that is on the Candidate List in a concentration above 0.1% (w/w).

5. Certified management systems at the production site/sites

Different Certifications for the Board and Polymer coating are as follows:

Board production	***Polymer coating***
ISO 9001	ISO 9001
ISO 14001	ISO 14001
FSC® CoC	FSC® CoC
BRC/IOP	BRC/IOP

6. 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 55-65 % relative humidity and 20-25° C. We recommend consumption within 12 months from manufacturing date and after this time rights of claims normally disappear.

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Disclaimer

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 certificate 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 certificate 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**
- **This certificate is only valid to the extent it has been signed and delivered by an authorized employee of the ITC Ltd-PSPD group.**
- **Nothing in this certificate 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 (e) the safety or legality in any use, processing and handling of our products.**
- **This certificate 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 certificate.**
- **No one other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party**

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