

January 22, 2020

Regulatory Compliance

Products: CrownBoard Craft

Production site: BillerudKorsnäs Skog & Industri AB, mill Frövi

Food contact

The product is manufactured from virgin fibres with addition of chemicals that meet the demands in FDA and BfR and also in accordance with good manufacturing practice.

Under normal, applicable and foreseeable conditions of use, the product does not transfer any constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof.

The products comply with the applicable paragraphs in:

- Regulation (EC) No 1935/2004 with amendments on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 with amendments on good manufacturing practice for materials and articles intended to come into contact with food.
- The German Food Law §§ 30 und 31 in der Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (LFGB)
- The German Recommendation BfR XXXVI revised as of September 1st, 2017
- The American Code of Federal Regulations Title 21 Chapter 1 - FDA Parts 176.170-180 revised as of April 1st, 2019

Restrictions

FDA § 176.170 Aqueous and fatty foods

- Allowed for Food types: I, II, IV-B and VII-B (as described within 21 CFR176.170 (c), table 1)
- Allowed for Conditions of use: E-G (as described within 21 CFR176.170 (c), table 2)

FDA § 176.180 Dry food

- Allowed for Conditions of use: E-G (as described within 21 CFR176.170 (c), table 2)

For specification of Conditions of and Food types see appendix 1.

As BillerudKorsnäs does not manufacture the finished board product, we need to notify you that our product contains chemicals listed in paragraph (b) and as such the final board product must be tested in accordance with paragraph (c) of 21 CFR 176.170.

BfR XXXVI.

The board grades may stand in direct contact with dry and fatty foodstuffs with both sides. It is limited to paper or paperboard which is intended to be used at temperatures up to 90 °C (holding and reheating of food).

General

For packing of aqueous and fatty goods we recommend a suitable barrier to avoid the filled goods to affect the physical properties of the product.

Packaging and Packaging Waste Directive

The products comply with Packaging and Packaging Waste Directive 94/62/EC with amendments. This directive defines requirements for the manufacturing and composition of packaging and prescribes fulfilment of essential requirements. This can be fulfilled by the use of the harmonized EN standards.

The sum of the concentration levels of lead, cadmium, mercury, and hexavalent chromium in our board products, specified above, do not exceed 100 parts per million by weight (100 mg/kg) in accordance with the limit in EC Packaging Waste Directive 94/62/EC, amending Directive 2004/12/EC, the Italian Law D.Lgs 3 aprile 2006 n. 152 Titolo II – Gestione degli imballaggi Art 226, 4. and the French Décret n° 2007-1467 du 12 octobre 2007 Art. 4.

The level of substances classified as hazardous to the environment is less than 0.1% and minimized (EN 13428).

The products are well suited for material recycling (EN13430) and for energy recovery (EN 13431).

Safety of toys – EN 71-3

The board grades specified above comply with the European Standard EN 71-3:2019 "Safety of Toys - Part 3: Migration of certain elements" as of April 17, 2019.

REACH

BillerudKorsnäs sites comply with the requirements/obligations of REACH, Regulation (EC) No 1907/2006 with amendments. BillerudKorsnäs is mainly a Downstream User of chemicals, which means that our suppliers are responsible for the registration of the chemicals that we purchase. Substances and Intermediates produced at our pulp mills are registered. Pulp is exempted from REACH registration.

Our fibre based products are defined as articles according to REACH.

There are requirements in REACH for substances of very high concern (SVHC). We regularly monitor the amendments of the Candidate list for Substances of Very High Concern and in the Annex XIV of the Regulation. Based on information from our suppliers we state that no SVHC substances listed in the "Candidate List of Substances of Very High Concern" from the European Chemicals Agency are present in concentrations above 0.1% in the products.

Disclaimer

The information provided in this declaration is provided based on our actual knowledge about the product and its components. BillerudKorsnäs assumes no responsibility for any deviations from this declaration of compliance which is due to facts or circumstances beyond our actual knowledge about the product and its components.

The product is sold without any express or implied warranty as regards fitness for any specific purpose of use. It is the user's responsibility to satisfy themselves as to the paper's suitability for the particular purpose(s) for which the user intends to use the paper and to obtain all necessary information for such assessment. It is the customer's responsibility to assure the appropriate, safe and legal use and handling of our products.

The statements in this declaration are subject to the limitations of liability and other applicable provisions set forth in general trade rules or any other separate written agreement governing the sale and purchase of paper between BillerudKorsnäs' and the addressee of this declaration.



This document is valid from date of signing until further notice, however not longer than until 2020-12-31.

BillerudKorsnäs Skog & Industri Aktiebolag
Production Gävle

Ann Britt Nilseng
Product Safety Manager

Appendix 1 FDA Food types and Conditions of use

FDA CFR Title 21 §176.170 Components of paper and paperboard in contact with aqueous and fatty foods (dated April 1 2016). Table 1 and table 2 are available on [FDA Website](#)

Food Types from Table 1 in 21 CFR 176.170 (c),

- I. Nonacid, aqueous products; may contain salt or sugar or both (pH above 5.0).
- II. Acid, aqueous products; may contain salt or sugar or both, and including oil-in-water emulsions of low- or high-fat content.
- III. Aqueous, acid or nonacid products containing free oil or fat; may contain salt, and including water-in-oil emulsions of low- or high-fat content.
- IV. Dairy products and modifications:
 - A. Water-in-oil emulsions, high- or low-fat.
 - B. Oil-in-water emulsions, high- or low-fat.
- V. Low-moisture fats and oil.
- VI. Beverages:
 - A. Containing up to 8 percent of alcohol.
 - B. Nonalcoholic.
 - C. Containing more than 8 percent alcohol.
- VII. Bakery products other than those included under Types VIII or IX of this table:
 - A. Moist bakery products with surface containing free fat or oil.
 - B. Moist bakery products with surface containing no free fat or oil.
- VIII. Dry solids with the surface containing no free fat or oil (no end test required).
- IX. Dry solids with the surface containing free fat or oil.

Conditions of use from table 2 in 21 CFR 176.170 (c),

- A. High temperature heat-sterilized (e.g., over 212 °F)
- B. Boiling water sterilized
- C. Hot filled or pasteurized above 150 °F
- D. Hot filled or pasteurized below 150 °F
- E. Room temperature filled and stored (no thermal treatment in the container)
- F. Refrigerated storage (no thermal treatment in the container)
- G. Frozen storage (no thermal treatment in the container)
- H. Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use