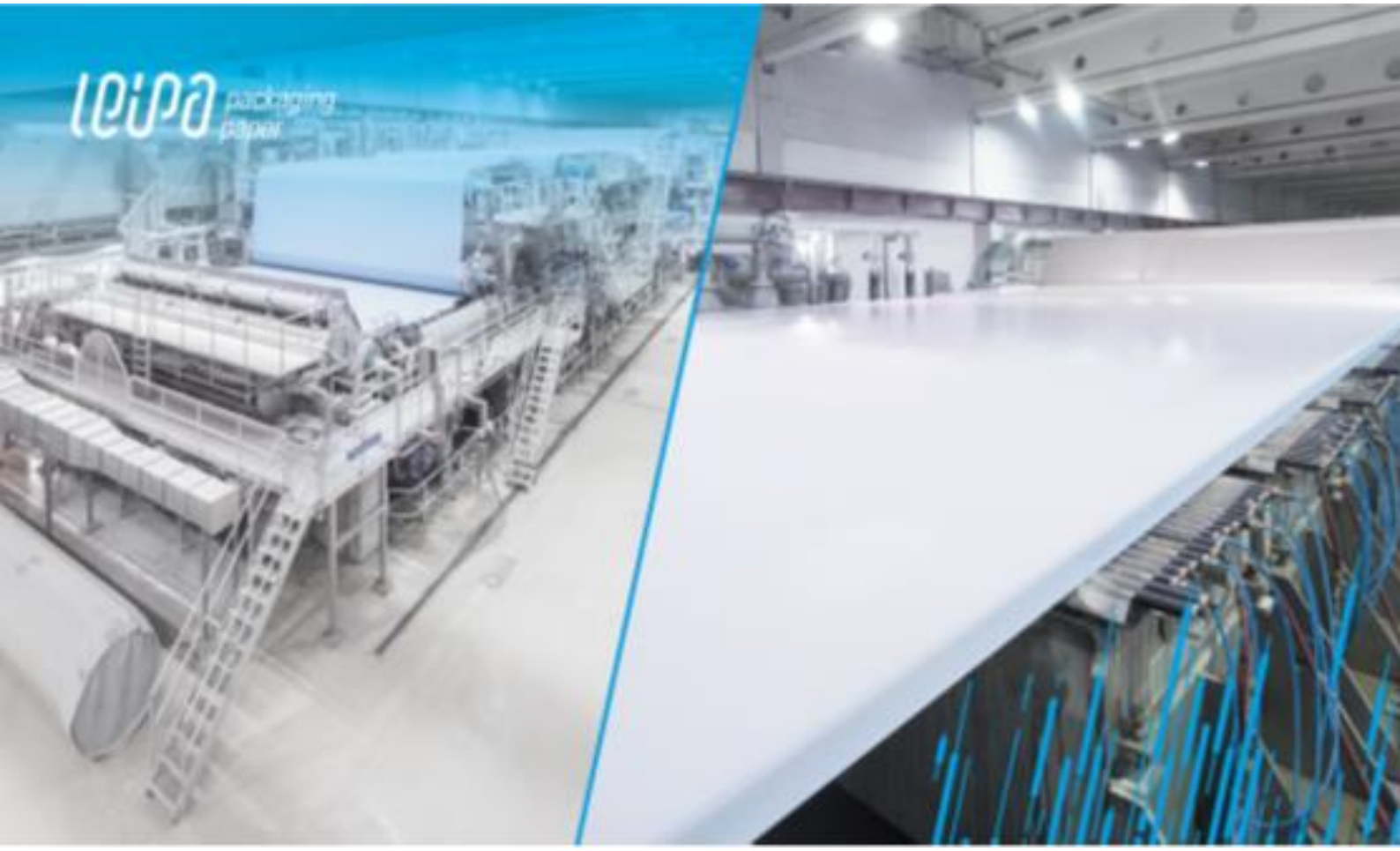


Declaration of Compliance

Trade name:	**LEIPA Classic white HS**
Variety:	White Top Testliner, uncoated
Description:	LEIPA Classic white HS is a recycled fiber based paper, of which the top side is in general characterized by coverage of white fibers on a recycled base layer.
Fiber source:	100 % recycled fiber
Certifications:	FSC®, PEFC, ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO 22000, EMAS
Manufactured by:	LEIPA
Production site:	LEIPA Georg Leinfelder GmbH Kuhheide 34 16303 Schwedt/Oder Germany
Date of issue:	**28.08.2026**

This declaration is valid for a period of two years from its date of issue. This declaration is affected by changes at the legislation, the manufacturing process, the final intended application or other requirements. The content of this declaration is regardless of the paper grammage.

1 Scope of application

LEIPA Classic white HS is a base paper for the manufacture of corrugated board packaging.
The following applies to use in the food sector:

It may come into direct contact with dry, non-fatty foods and with foods that are peeled or washed before consumption. It may be used as secondary packaging. In the case of dry, non-fatty foods with a large surface area, particular consideration must be given to the migration of volatile and hydrophobic substances via the gas phase. This can be addressed through the overall packaging concept — for example, by additionally using suitable intermediate packaging or barrier solutions.

2 Food Contact Regulation

We hereby confirm that the above mentioned trade product is in compliance with the relevant requirements of the following regulations:

- Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food.
- Regulation (EC) 2023/ 2006 on Good Manufacturing Practice for materials and articles intended to come into contact with food.
- German BfR XXXVI. Recommendation (as of 01.10.2025) on paper and board for food contact.
- Resolution CM/ Res (2020) 9.

3 Global Product Safety Regulation

The General Product Safety Regulation (EU) 2023/988, which entered into force on 13 December 2024, establishes the requirements for the safe placing of products on the European market. As a German manufacturer, LEIPA hereby confirms its compliance with the provisions of the aforementioned regulation.

4 Food Allergens

No substances or products that cause allergies or intolerances as listed in Annex II of Regulation (EC) No 1169/2011 are intentionally used in the manufacture of the aforementioned commercial product. These are the following substances:

- Crustaceans and products thereof;
- Eggs and products thereof;
- Fish and products thereof;
- Peanuts and products thereof;
- Soybeans and products thereof;
- Milk and products thereof (including lactose);
- Nuts, namely: almonds (Amygdalus communis L.), hazelnuts (Corylus avellana), walnuts (Juglans regia), cashews (Anacardium occidentale), pecan nuts (Carya illinoinensis (Wangenh.)K. Koch), Brazil nuts (Bertholletia excelsa), pistachio nuts (Pistacia vera), macadamia or Queensland nuts (Macadamia ternifolia), and products thereof;
- Celery and products thereof;
- Mustard and products thereof;
- Sesame seeds and products thereof;
- Lupin and products thereof;
- Molluscs and products thereof;
- Natural rubber latex and products thereof;
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO2 which are to be calculated for products as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers.

However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain traces of allergens.

5 Gluten Content

The gluten content of our starch does not exceed 200 ppm. According to our risk assessment this leads to a maximum gluten content of 0,001 % in our products. Gluten free labelling for food can be used if the gluten content does not exceed 20 mg/ kg. According to Regulation (EC) 828/ 2014 the trade name can be labeled as “gluten free”.

6 GMO

No genetically modified organisms are intentionally used in the manufacture of the above-mentioned commercial product. However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain traces of genetically modified organisms.

7 Heavy Metals

We hereby confirm that the trade product is in compliance with the substance requirements pursuant to Article 5 of the (EU) 2025/40 Packaging and packaging waste regulation (PPWR). For all Packaging Papers, the limit value that remains in force for the total content of heavy metals – lead (Pb), cadmium (Cd), mercury (Hg) and chromium (VI) – is complied with:

- Σ (Pb+Cd+Hg+Cr VI) ≤ 100 mg/kg of the material.

8 Animal origin

No substances of animal origin are intentionally used in the manufacture of the aforementioned commercial product. This includes the following substances:

- Substances that transmit BSE and TSE
- Casein

However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain traces of substances of animal origin.

9 Dual-Use – Ingredient list

After a thorough review of Regulation 1129/2011 with regard to food safety, LEIPA has compiled a list of the chemicals used that may also serve as food additives. We would be happy to provide you with this list upon request. Please contact your sales representative for more information.

10 Restriction of Hazardous Substances / Halogens

In accordance with Regulation (EC) 2011/65 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, we confirm that the commercial product does not contain any substances listed in Annex II. However, due to the use of recycled paper as our fiber source, we cannot rule out the presence of trace amounts of certain hazardous substances in our products. The use of halogens in the manufacturing process is kept to a minimum. However, since halogens are components of the biocide systems, we cannot guarantee the absence of halogens.

11 REACH / Substance of Very High Concerns (SVHC)

The European Chemicals Agency (ECHA) has proposed a list of substances of very high concern (SVHCs). According to Art. 33 of the REACH Regulation, producers and suppliers have to inform their customers if their products contain SVHC-substances in a concentration above 0,1 %(w/w). We would be happy to provide you with our current document upon request. Please contact your sales representative for more information.

No persistent organic pollutants (POPs) are intentionally used in the manufacture of the aforementioned commercial product. Compliance with Regulation (EU) 2019/1021, including amendment (EU) 2020/784 regarding persistent organic pollutants (POPs), is hereby confirmed. Furthermore, no endocrine disruptors are intentionally used. However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain trace amounts of persistent organic pollutants and endocrine disruptors.

12 TSCA

After reviewing Section 6(a)2 of the TSCA, we can confirm that none of the substances listed therein are used in the manufacture of the above-mentioned commercial product.

13 Conflict materials / Rare earth elements

For the manufacturing of our packaging papers LEIPA doesn´t intentionally add any of the following conflict materials: Tin, Tantalum, Tungsten and Gold.

For the manufacturing of our packaging papers LEIPA doesn´t intentionally add rare earth elements.

14 Other substances of concern

In regard to the information of our suppliers as well as our own monitoring and technical knowledge we hereby confirm that LEIPA does not intentionally add the substances listed below during our pulp and papermaking process concerning the manufacturing of the aforementioned commercial product.

- Benzophenone and hydroxybenzophenone;
- Biocides;
- Bisphenol A, bisphenol F and bisphenol S;
- Dimethylacetamid (DMAC);
- Para-Nitroanisole;
- Pentachlorphenol (PCP);
- Perfluorooctanoic Acid (PFOA) and perfluorooctane Sulfonate (PFOS);
- Phtalate;
- Primary Aromatic Amines (PAA).
- TiO2 (titanium dioxide)
- ITX (Isopropylthioxanthone CAS 5495-84-1)
- PVC / PVdC
- BHA (CAS 25013-16-5)
- BHT (CAS 128-37-0)
- TCA (CAS 87-40-1)
- Black carbone
- PBB / PBDE
- CMR
- Dimethyl fumarate
- Anthraquinone
- Resorcinol (CAS 108-46-3)
- Mancozeb (CAS 8018-01-7)
- Cholecalciferol (CAS 67-97-0)
- Benzophenone

LEIPA promotes the sustainability and safety of its products based on legal and environmental standards. Should the listed substances be present in our raw materials in trace amounts, their levels fall below the limits established by law or industry standards. This is due to the use of recycled paper as our fiber source.

15 Bleaching process / optical brightner

We hereby confirm that oxygen-based bleaching systems are used in the production of graphic and packaging paper based on recovered paper. Thus we can ensure that no chlorine and/or chlorine compounds are used during production or stock preparation. - The process is referred to as PCF (Process Chlorine-Free). With regard to the use of optical brighteners, we comply with BfR recommendation XXXVI and can confirm, that the used amount is below the specified limit.

16 MOSH/MOAH

No products containing mineral oils are intentionally used in the manufacture of the aforementioned commercial product. However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain traces of mineral oils.

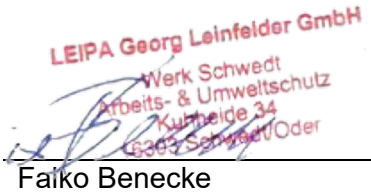
17 Nanomaterials

No nanomaterials are intentionally used in the manufacture of the aforementioned commercial product. However, due to the use of recycled paper as our fiber source, we cannot rule out the possibility that our products contain traces of nanomaterials.

18 Disclaimer

The document was prepared with great thoroughness and it is governed by local directives and legislations. The content of the present document relates to the above mentioned trade product and is kept up-to-date. This statement does not constitute a guarantee and does not relieve the user of the packaging material of their obligation to inspect the product. Please note that the packager of a consumer product is ultimately responsible for selecting the packaging material.

Only the owner of the packaging process possesses the necessary detailed knowledge to identify packaging material that meets their specific requirements. The manufacturer of the packaging material can only provide advisory support in this regard. As the manufacturer, we are liable only within the scope of statutory product liability for compliance with all specified properties of the packaging material we supply.



Falko Benecke
Manager IMS

ISEGA
Cert GmbH Aschaffenburg

Dr. Ralph Derra
Öffentlich bestellter und vereidigter Sachverständiger für Verpackungsmaterialien, Boden- und Luftanalysen; Sachverständiger in der Wasseranalytik

3 June 2026
Dr. Dr/lls-kr

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen registered no. registré	67328 U 26
für for pour	LEIPA Georg Leinfelder GmbH Kuhheide 34 16303 Schwedt/O. Germany
Produkt Product Produit	LEIPA classic white HS

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us in consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact”, current status, in connection with the BfR guideline “Testing of substance transfers from consumer articles made of paper, cardboard and paperboard”, as of 28 September 2023),

Zeppelinstraße 3-5 . 63741 Aschaffenburg . Germany . Fon: +49 6021 4989-0 . E-Mail: info@isega.de . www.isega.de
Geschäftsführer: Dr. Ralph Derra . Handelsregister Aschaffenburg HRB 15587

Die Veröffentlichung von Ergebnissen unserer Arbeiten und Gutachten sowie die Verwendung für Werbezwecke bedürfen – auch auszugsweise – unserer schriftlichen Genehmigung.
Erfüllungsort und Gerichtsstand Aschaffenburg.

and according to the Council of Europe's

Technical guide on paper and board used in food contact materials and articles, as of 2021,

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, the paper grade was tested for heavy metals and total organic fluorine (TOF) according to the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025,

as well as for heavy metals according to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

The paper grade is in compliance with the rules of the

Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 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 L 338/4 of 13.11.2004, 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) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 3 des Gesetzes vom 3. Februar 2026 (BGBl. 2026 I Nr. 29), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl I. p. 4253; 2022 I p.28), last amended by article 3 of the act of 3 February 2026 (BGBl. 2026 I no. 29), §§ 30 and 31),

and conforms to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025).

The demands of the

> 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,

as well as of the supplementary

> Technical guide on paper and board used in food contact materials and articles, as of 2021,

are met by the paper grade.

Considering the associated EU Guidance document, it also meets the

> Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5, 4. and 5.,

as well as the

> Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021,

regarding the heavy metal content.

Thus the paper grade **LEIPA classic white HS** according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty food and such food which is peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty food with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the overall packaging concept, e.g. by additionally using an appropriate intermediate packaging or barrier solutions.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision

(Höfert)
Officially certified
and authorized food
chemist

The translation of the above stamps is given on page 4.
La traduction des estampilles est donnée en page 4.

Staatlich anerkannter Sachverständiger zur Untersuchung der Gegenproben von Verpackungsmitteln aus Papier, Pappe, Kunststoffen, Glas, Weißblech und sonstigen Metallverpackungen auf ihre lebensmittelrechtliche Unbedenklichkeit

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce.

State registered expert for the analysis of contrasting samples of packaging materials of paper, board, plastics, glass, tin plate and other metallic packaging materials as to their suitability for use with foodstuffs.

Expert public pour l'étude du contrôle des contre-échantillons d'emballages de papier, cartons, plastiques, verre, fer-blanc et d'autres emballages métalliques concernant leur conformité alimentaire.

Dr. Ralph Derra

Authorized expert for the analyses of soil and air, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse du sol et de l'air, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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