



Declaration of Compliance

<i>Trade name</i>	LEIPA Classic white HS
<i>Variety</i>	White Top Testliner, uncoated
<i>Description</i>	LEIPA Classic white HS is 100% recycled fibre based paper, of which the top side is in general characterized by coverage of white fibres on a recycled base layer.
<i>Fiber source</i>	100% recycled fiber
<i>Certification</i>	FSC®, PEFC, ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO 22000, EMAS
<i>Manufactured by</i>	LEIPA
<i>Production site</i>	LEIPA Georg Leinfelder GmbH Kuhheide 34 16303 Schwedt
<i>Date of issue</i>	18.02.2025

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.

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 01.08.2024) on paper and board for food contact.
- Resolution CM/ Res (2020) 9.

We can confirm that the trade product can be used safely as food packaging. It may stand in direct contact with such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with a large surface, the migration of volatile and hydrophobic substances via gas phase has to be considered particularly. This could be ensured by the use of suitable an appropriate intermediate packaging.

Food Allergens

Substances or products causing allergies or intolerances according to Regulation (EC) 1169/ 2011 - Annex II are not intentionally added / not used as raw materials in our paper production:

- 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 illinoensis* (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.

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".

Heavy metals

We hereby confirm that the trade product is in compliance with Article 11 of the European Parliament and Council Directive 94/ 62/ EC on packaging and packaging waste. Furthermore the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium is less than 100 ppm.

Animal origin

Based on the information from our suppliers and our own monitoring we hereby confirm that the trade product do not contain substances originating from animals as intentionally added raw materials.

Toy safety

We hereby confirm that the above mentioned trade product is in compliance with the part 3 "Safety of Toys, Migration of Certain Elements", part 9 "Safety of Toys, Organic chemical compounds – Requirements", part 10 "Safety of Toys, Organic chemical compounds – Sample preparation and extraction" as well as part 11 "Safety of Toys, Organic chemical compounds – Methods of analysis" regarding the DIN EN 71.

Restriction of Hazardous Substances

According to Regulation (EC) 2011/ 65 on the restriction of the use of certain hazardous substances in electrical and electronic equipment we hereby confirm that the trade product do not contain substances which are listed in Annex II.

REACH

The European Chemicals Agency (ECHA) has proposed until now 247 substances and chemicals to the list of substances of very high concern (SVHCs), including the supplements from 20th January 2025. 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). Please use this document as the required information.

In our production lines for paper and corrugated board base paper none of the persistent organic pollutant (POP) and SVHC-substances are used. No endocrine disruptors are used either. In addition, the used chemicals in our production do not contain any of the listed substances of very high concern.

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 above mentioned trade product.

- Benzophenone and hydroxybenzophenone;
- Biocides;
- Bisphenol A, bisphenol F and bisphenol S;
- Dimethylacetamid (DMAC);
- Para-Nitroanisole;
- Pentachlorophenol (PCP);
- Perfluorooctanoic Acid (PFOA) and perfluorooctane Sulfonate (PFOS);
- Phtalate;
- Primary Aromatic Amines (PAA).

Based on the legal and environmental legitimation LEIPA encourages the sustainability and safety of their products. In case that the listed substances exist as traces in our raw materials their content is below the specified limits, which required during legislation or industry standards.

Bleaching process

We hereby confirm that oxygen-based bleaching systems are used in the production of graphic and packaging paper made from 100% 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).

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.

T. Schmidt

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i.V. Tobias Schmidt
Manager Technical Service

Dr. Ralph Derra

Öffentlich bestellter und vereidigter Sachverständiger für
Verpackungsmaterialien, Boden- und Luftanalysen;
Sachverständiger in der Wasseranalytik

14 January 2025

Dr. Dr/IIs-kr

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

63760 U 25

für
for
pour

LEIPA Georg Leinfelder GmbH
Kuhheide 34
16303 Schwedt
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),

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 limited heavy metals according to the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as 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 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 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 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and conforms to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970, Stand vom 01.08.2024,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024).

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.

With regard to the content of heavy metals, it also meets the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

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.

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 use of an appropriate intermediate packaging.

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

Certification decision



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

(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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