

28 April 2023
Dr. Dr/Be-db/ci

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

59399 U 23

für
for
pour

Papierfabrik Palm GmbH & Co. KG
Werk Wörth PM6
Am Oberwald 2
76744 Wörth am Rhein
Germany

Produkt
Product
Produit

Testliner
Wellenstoff
Schrenz
Palm Kraft

The products manufactured by the company mentioned above are paper grades which are used for food packaging.

They were examined by us under 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 26.02.2015,

(BfR-"Collection of methods for the examination of paper and board for food contact" of the, current state), in connection with the BfR guideline "Examination of the transfer of substances from consumer products made of paper and board", as of 26.02.2015),

and of the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Allegato II, sezione 4 e Allegato IV, last amended on 14 November 2019,

and of the

Regeling van de Minister van Volksgezondheid, Welzijn van 14 maart 2014, kenmerk 328583-117560-VGP, houdende vaststelling van de Warenwetregeling verpakkingen en gebruiksartikelen die in contact komen met levensmiddelen (Warenwetregeling verpakkingen en gebruiksartikelen), Staatscourant 2014 Nr. 8531 van 27 maart 2014, last amendment by Regeling van de Minister van Volksgezondheid, Welzijn en Sport van 26 april 2022, kenmerk 3348384-1027396-VGP, Staatscourant 2022 Nr. 11934 vom 29 April 2022,

as well as of 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.

In addition, a sensory test and an analysis for perspiration and saliva resistance was carried out.

Furthermore, the content of heavy metals was determined 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,

and to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

as well as the migration of certain elements according to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021.

Moreover, the absence of prohibited amines and colorants according to the

DIN EN 71, part 10 "Safety of Toys, Organic chemical compounds – Sample preparation and extraction", state of March 2006,

as well as to the

DIN EN 71, part 11 "Safety of Toys, Organic chemical compounds – Methods of analysis", state of January 2006,

was tested.

The paper grades are 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 2 Absatz 6 des Gesetzes vom 20. Dezember 2022 (BGBl. I S. 2752), §§ 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 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

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 grades.

Furthermore, the paper grades meet the analytical requirements of the Italian

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Allegato IV, last amended on 14 November 2019.

and of the

Regeling van de Minister van Volksgezondheid, Welzijn van 14 maart 2014, kenmerk 328583-117560-VGP, houdende vaststelling van de Warenwetregeling verpakkingen en gebruiksartikelen die in contact komen met levensmiddelen (Warenwetregeling verpakkingen en gebruiksartikelen), Staatscourant 2014 Nr. 8531 van 27 maart 2014, last amendment by Regeling van de Minister van Volksgezondheid, Welzijn en Sport van 26 april 2022, kenmerk 3348384-1027396-VGP, Staatscourant 2022 Nr. 11934 vom 29 April 2022.

Furthermore, the paper grades meet the analytical requirements of 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,

and of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008.

The requirements of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021,

and of the

DIN EN 71, part 9 "Safety of Toys, Organic chemical compounds – Requirements", state of September 2007,

are kept by the paper grades.

Therewith, the production of the paper grades meets the demands of the

Commission Regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, Official Journal of the European Union no. L 384/75 of 29 December 2006, last amendment of 27 March 2008 by the Commission Regulation (EC) No 282/2008.

Third party documents were used for the evaluation.

In addition, the paper grades are resistant to perspiration and saliva.

Thus, the paper grades **Testliner**, **Wellenstoff**, **Schrenz** and **Palm Kraft**, according to the sample material submitted, may be used safely in the field of food packaging. They may stand in direct contact with dry, non-fatty foodstuffs and 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 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 5 pages. It was subsequently modified on 20 July 2023.

Certification decision



staatlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Karton, Glas, Weißblech und
sonstigen Metallverpackungen auf ihre
Lebensmittelverpackung

(Behrendt)

Officially certified
and authorized food
chemist

The translation of the above stamps is given on page 5.
La traduction des estampilles est donnée en page 5.



**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 Aschaffenburg Chamber of Industry and Commerce.

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

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.

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.
Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

A file sample of the tested material is kept at the expert's office.

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.