

Lebensmittelrechtliche Konformitätserklärung

Für unseren Artikel:

Hamburger-Papier Eco Newspaper 33x38cm

mit der folgenden Artikel-Nummer:

1233382

Hiermit bestätigen wir auf der Grundlage der uns vorliegenden Lebensmittelunbedenklichkeits-erklärung des Produzenten, dass die von uns oben genannten Artikel für den Kontakt mit Lebensmitteln geeignet sind und den dafür vorgesehenen Gesetzen sowie Richtlinien entsprechen.

Zum eigenen Schutz unserer Lieferquellen sind Vorlieferant und Untersuchungslabor sowie dritte beteiligte Personen unkenntlich gemacht. Die uns vorliegende Originalerklärung kann den zuständigen Behörden auf Verlangen zur Verfügung gestellt werden.

Unsere Bestätigung setzt voraus, dass der Packstoff sachgemäß weiterverarbeitet wird. Die spezielle Eignung dieses Packstoffes kann nur vom sachkundigen Füllguterzeuger oder Abpacker beurteilt werden.

Diese Konformitätserklärung ersetzt zuvor ausgestellte Konformitätserklärungen und besitzt eine allgemeine Gültigkeit ab Ausstellungsdatum bis zum 23.10.2025 bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 24.10.2023

Nette GmbH
Göttingen
[Handwritten signature]

Lebensmittelunbedenklichkeitserklärung des Lieferanten:

ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

Declaration of Compliance

Product:

■■■■■® eco ■■■■■

Date:

24.10.2023

Valid:

23.10.2025

Grade IDs:

■■■■■, 26 gsm
■■■■■, 30 gsm
■■■■■, 30 gsm
■■■■■, 33 gsm
■■■■■, 38 gsm
■■■■■, 45 gsm

Version:

03.0

Intended use and conditons of use

The product may be used safely for food packaging. It may stand in direct contact with dry, moist and fatty foodstuffs.

According to recommendation XXXVI of the German Bundesinstitut für Risikobewertung (BfR), above mentioned papers can be used at temperatures up to 90°C (holding and reheating of food).

General compliance

■■■■■ ■■■■■ ■■■■■ ■■■■■ is certified according to the standards ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018 and BRCGS Packaging Materials Issue 6, August 2019. Certificates available upon request.

Note: The certification according to the standards of ISO 9001:2015 and the BRCGS Packaging Materials ensures the compliance with Commission Regulation (EC) No 2023/2006 of 22nd of December 2006 amended, on good manufacturing practices for materials and articles intended to come into contact with food.

■■■■■ is certified according to the standards FSC™-STD-40-004 (FSC-C109921) and PEFC™ ST 2002:2013. Certificates available upon request.

■■■■■. complies with Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the EU market. As well as Commission Implementing Regulation (EU) No. 607/2012 of 6 July 2012. Confirmation available upon request.

■■■■■ complies with all relevant REACH requirements according to regulation (EC) 1907/2006. Above mentioned paper grades do not contain any substances listed on the most recently published „Candidate List of Substances of Very High Concern (SVHC) for Authorisation“ in a concentration above 0.1% (w/w).

Pulp as a raw material

It is hereby confirmed that no recycled raw materials are used in above mentioned products. Pulps used for these products are sourced from FSC™ certified, FSC™-CW or, PEFC™ certified sources. Pulps used are 100% virgin raw materials and are made using ECF (Elemental Chlorine Free) or TCF (Totally Chlorine Free) bleached chemical pulps.

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Geschäftsführer: Dipl.-Kfm. Michael Nette
Steuer-Nr.: 20/210/22840
Amtsgericht Göttingen HRB 1028
USt-Id-Nr.: DE249606280
ZSVG-Nr.: DE 5544 530 633 838

Wir sind
FSC®-zertifiziert.
TUEV-COC-001347
FSC® C144366
Nur die als solche
gekennzeichneten Artikel
sind FSC®-zertifiziert.



The product is in compliance according to laws and regulations listed below:

- 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).
- 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 amendment by article 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 30 and 31.
- German recommendation, BfR 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).
- Statutory Instruments 2012 No. 2619 Materials and Articles in Contact with Food (England) Regulations 2012 (state of 20 November 2012), Part 2, Section 4 (1)
- Scottish Statutory Instruments 2012 No. 318 Materials and Articles in Contact with Food (Scotland) Regulations 2012 (state of 28 March 2019), Part 2, Section 4 (1)
- Welsh Statutory Instruments 2012 No. 2705 (W.291) Materials and Articles in Contact with Food (Wales) Regulations 2012 (state of 26 July 2018), Part 2, Section 4 (1)
- Statutory Rules of Northern Ireland 2012 No. 384 Materials and Articles in Contact with Food Regulations (Northern Ireland) 2012 (state of 20 November 2012), Part 2, Section 4 (1)
- 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
- Technical guide on paper and board used in food contact materials and articles, as of 2021
- 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, regarding the heavy metal content.
- Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008, regarding the heavy metal content.
- Swiss regulation: SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (state on 15. July 2022), article 49.
- Swiss regulation: SR 817.023.21 Ordinance of the FDHA on Materials and Articles of 16 December 2016 (state on 15 October 2022), article 27. (i.e. Verordnung des EDI über Bedarfsgegenstände vom 16. Dezember 2016, (Stand am 15 Oktober 2022), Artikel 27).
- Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires. (i.e. MCDA Sheet 4 (V02 – 01/01/2019), Food contact ability of organic materials based on plant fibres intended to come into contact with foodstuffs).
- Décret n°2007-766 du 10 mai 2007 portant application du code de la consommation en ce qui concerne les matériaux et les objets destinés à entrer en contact avec les denrées, alimentaires, dernière modification par le décret n°2011-385 du avril 2011. (i.e. Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011-385 of 14 April 2011).
- Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (29 March 2022 edition), §§ 176.170 and 176.180.
- The marketability in Italy is given by Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last amended on 25 November 2022

The product is certified by the accredited third-party institute

Certificate available upon request.

Analysis for compliance with the demands on food contact materials

Substances	Result	Detection limit	Method
Methanal (Formaldehyde)	Not quantifiable	<0,004 mg/g dry matter	DIN EN 1541:2001-07
Glyoxal	Not quantifiable	<0,005 mg/g dry matter	DIN 54603:2008-08
Anthraquinone	Not quantifiable	<0,13 mg/kg dry matter	SOP 160.200 by means of GCMS
2-Ethylantraquinone	Not quantifiable	<0,13 mg/kg dry matter	
1,3-Dichloro-2-propanol (DCP) 3-Monochloro-1,2-propanediol (MCPD)	Not detected Not detected	<2 µg/l water extract	Analytical Methods §64 of the LFGB, method B 80.56-2:2002-09; DIN EN 645:1994-01
Polychlorinated Biphenyls (PCBs) 2,2',5'-Trichlorobiphenyl 2,4,4'-Trichlorobiphenyl 2,2',5,5'-Tetrachlorobiphenyl 2,2',4,5,5'-Pentachlorobiphenyl 2,2',3,4,4',5'-Hexachlorobiphenyl 2,2',4,4',5,5'-Hexachlorobiphenyl 2,2',3,4,4',5,5'-Heptachlorobiphenyl	Not quantifiable	<0,01 mg/kg dry matter	DIN EN ISO 15318:1999-12
Elements in the Water Extract Mercury (Hg) Cadmium (Cd) Lead (Pb) Chromium (Cr) Aluminium (Al)	Not quantifiable Not quantifiable Not quantifiable Not quantifiable Not quantifiable	<0,001 mg/l water extract <0,001 mg/l water extract <0,001 mg/l water extract <0,004 mg/l water extract <0,2 mg/l water extract	DIN EN 12497:2005-11 and DIN EN 12498:2019-02
Determination of Heavy Metals Arsenic (As) Cadmium (Cd) Chromium (Cr) Mercury (Hg) Lead (Pb)	Not quantifiable Not quantifiable 1,7 mg/kg dry matter Not quantifiable Not quantifiable	<2 mg/kg dry matter <0,5 mg/kg dry matter <0,25 mg/kg dry matter <5 mg/kg dry matter	Performed after microwave disintegration by means of AAS or ICP- OES.
Organic Solvent Extract Sum C₁₄-C₄₀ Dialkyl ketones Dipentadecyl ketone (Palmitone) Pentadecylheptadecyl ketone Diheptadecyl ketone (Stearone) Heptadecylnonadecyl ketone Dionadecyl ketone Nonadecylheneicosyl ketone Diheneicosyl ketone	0,6 mg/g dry matter 0,4 mg/g dry matter		SOP 160.200 by means of GC-FID

Substances	Result	Detection limit	Method
Polycyclic Aromatic Hydrocarbons (PAH) Naphtalene 2-Methyl naphtalene 1-Methyl naphtalene Acenaphthylene* Acenaphthene Fluorene* Phenanthrene Anthracene 2-Methyl phenanthrene Fluoranthene* Pyrene Benzo[c]phenanthrene Benzo[b]naphtho[1,2-d]thiophene Benzo[a]anthracene Triphenylene/ /Chrysene* Benzo[b]fluoranthene Benzo[k]fluoranthene Benzo[e]pyrene Benzo[a]pyrene Perylene Indeno[1,2,3,-cd]pyrene Dibenzo[a,h]anthracene* Benzo[g,h,i]perylene	None of these compounds were quantifiable	*Limit = 0,03 mg/kg dry matter; For all other compounds the limit = 0,02 mg/kg dry matter	Performed according to the draft standard by means of GCMS.
Primary Aromatic Amines in Water Extract	None of the compounds were quantifiable	0,002 mg/l water extract	DIN EN 17163-2019-05 by means of LCMS
Determination of the Lead Migration	Not determinable	< 0,5 µg/dm²	According to the method described in the Italian "Decreto Ministeriale"
EOF (extractable organic fluorine)	Not quantifiable	< 5 mg/kg	Test of total F by oxygen combustion on the extraction. Extraction in ethanol and drying in microcrystalline.
Test for Fluorescent Substances	Above mentioned paper does not contain optically brightened fibres		UV irradiation

Microbiological testing

Microbiological purity is tested from the paper grades as random sampling twice a year.

The transfer of antimicrobial constituents from the paper is tested (according to DIN EN 1104:2019-01) and considered as not detected.

Mineral oils (MOSH and MOAH)

Sources of mineral oils, MOSH and MOAH, in food contact materials are considered to be mainly from residual inks and certain adhesives found in recycled fibres. [REDACTED] papers are produced using 100% virgin fibers and thus do not contain any third party pre-consumer or post-consumer recycled fibers.

Assessment of specific substances

Based on recipe assessment and supporting information obtained from suppliers the following substances are considered to be not intentionally added:

- Allergens according to Annex II Regulation 1169/2011. Traces of sulphur dioxide and sulphites may be present in some incoming raw materials, however, they are reasonably not expected to exceed the EU limit of 10 mg/kg in the paper.
- SVHC substances (Substances of Very High Concern), in a concentration above 0.1% (w/w)
- Azo dyes
- Bisphenol A (BPA)
- Genetically modified organisms (GMO)
- Per- and polyfluoroalkyl substances PFAS (including PFOS, PFOA)
- Phthalates
- Post-consumer recycled raw materials
- Substances of animal origin

Recyclability

Above mentioned product in its original form is recyclable, if the local appropriate collection and sorting is organized and the local appropriate infrastructure exists. The product conforms to Directive 94/62/EC on packaging and packaging waste concerning heavy metals.

Evaluation according to  @ 501:2019: recyclable with paper, Level C

Level C : the sample can be recycled with paper both efficiently and economically using widespread present day technology. The sample can be recycled in industrial plants which treat waste of ordinary grades and even waste from urban waste collection once the standard recycling process has been adapted. The recycled sample produces less than 40% waste and/or a significant contribution of adhesive particles or cellulose fiber flakes.

Compostability

The Compost Manufacturing Alliance In-Vessel (CMA-I):  eco  has been certified through CMA for CMA In-Vessel Covered facilities. Certificate available upon request.

ASTM 6868-19:  eco  has met the requirements to be considered compostable as judged by ASTM D6868-19. Certificate available upon request.

TÜV Austria: OK compost HOME and OK compost INDUSTRIAL

 eco  (maximum grammage 38 gsm – 10003899, 10003983, 10004085, 10004180) has been certified through TÜV Austria for compostability at home as well as under industrial conditions.

 eco  has met the requirements for

- Test Program with reference OK 2 edition D "Home compostability of products"
- Test Program with reference OK 1 edition E including EN 13432 (09-2000): "Packaging – Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging"

Certificates available on request.

Storage conditions and shelf life

The paper has to be stored wrapped to avoid exposure to dust, odour, moisture and direct sunlight. The paper shall be stored under ambient conditions as specified below, properly protected against above mentioned exposures.

Optimal environment conditions:

Relative humidity: 55-65%

Temperature: 20-25°C

Subject to proper storage of the goods in accordance with storage conditions as set forth in this document and customary practice, the goods maintain the properties and characteristics for twelve months as of delivery. [REDACTED] does not undertake any warranty in respect to defects of the goods caused by any processing or alteration of the goods by the customer which adversely effects properties, characteristics or the performance of the goods.

Validity of this document

This document – Declaration of Compliance – is valid for the date given. If it proves to be necessary to renew it based on the test results, raw material changes or similar reasons, it can be renewed before the expiring date. It is valid two years from the date given unless updated before. The newer version is always the valid version. Document is valid without signature.

Disclaimer:

To the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. The legislation cited above applies to the specified paper product as it leaves production. It is the customers responsibility to verify compliance with any and all relevant regulatory and legislative requirements and specifications of the consumer end- product under the actual and foreseeable conditions of use.

Intentionally added shall mean deliberately utilized in the formulation of material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Based on reasonable investigations, the information set out herein is accurate to our current knowledge only and not all the information and requirements listed above are checked with all raw material suppliers. 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. Please note that analyses are only made on representative paper samples and not all substances are measured.

Nothing in this certificate shall be interpreted as a warranty or guaranty (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. No one other than the addressee may rely on this certificate, and we assume no liability whatsoever to any third party. This certificate is only valid to the extent it has been delivered by an authorized employee of delfort group. It is the responsibility of the converter or food packer to control that the final consumer product complies with the requirements of the intended and foreseeable conditions of use.

ENDE LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN

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