

## Lebensmittelrechtliche Konformitätserklärung

**Für unseren Artikel:**

**Hamburger-Papier Eco braun "Natürlich" 33x38cm**

**mit der folgenden Artikel-Nummer:**

**1233383**

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 04.08.2026 bzw. bis zur Änderung der Gesetzeslage.

Göttingen, den 06.08.2024

**Nette GmbH**  
Göttingen  
*[Handwritten signature]*

## Lebensmittelunbedenklichkeitserklärung des Lieferanten:

\*\*\*ANFANG LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN\*\*\*

### Declaration of Compliance

#### Products:

® eco  
® eco nature

Date: 06.08.2024  
Valid: 04.08.2026

#### Manufacturer:

Version: Vr 3.0

### General Compliance

is certified according to the standards ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, ISO 50001:2018 and ISO22000:2018. Certificates available upon request.

### Food Contact Safety and Compliance

#### Food Safety Management System

is certified according to the standards ISO 9001:2015 and ISO22000:2018. Paper machine 11 is also certified according to the FSC 22000 requirements.

Note: The integrated management system based on the standards of ISO 9001:2015 and ISO22000:2018 and incorporated elements ensure 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.

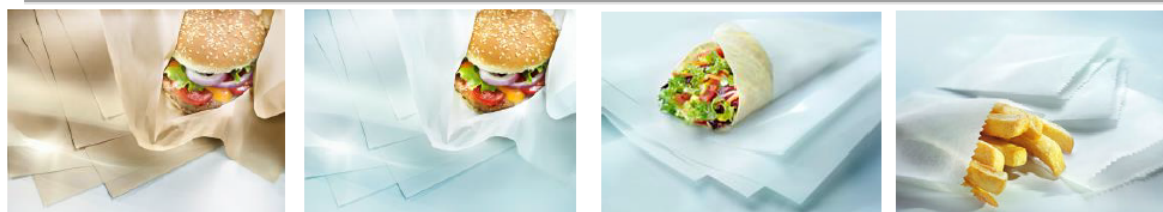
#### Intended use and conditions of use

Products may be used safely for food packaging at temperatures up to 90°C. They may stand in direct contact with dry and moist foodstuffs. They may also be in direct contact with fatty food which are assigned to a correction factor of at least 2 in accordance with Annex 3, table 2 of Commission Regulation (EU) No 10/2011. Products can be used safely to produce sales and transport packaging in the fast-food sector thus are safe to use in fast food applications. Possible limitations are described below the applicable law and regulation in question.



## The products are in compliance according to laws and regulations listed below:

- 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
- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27<sup>th</sup> of 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 L338/4 of 13<sup>th</sup> of November 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), (b) and (c)
- 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<sup>th</sup> of December 1994, on packaging and packaging waste, Official Journal of the European Communities L365/10 of 31<sup>st</sup> of December 1994, last amendment by the Directive 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L150/141 of 14<sup>th</sup> of June 2018, regarding heavy metal contents
- German recommendation XXXVI, paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14(1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023
- Foodstuffs, Consumer Goods 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 11 of the law of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31
- Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer code, which concerns materials and articles intended to come into contact with food, Official Journal of the French Republic no. 0109 of 11 May 2007, last modified by Decree no. 2011-385 of 11 April 2011, Official Journal of the French Republic no. 0087 of 13 April 2011
- DGCCRF – Fiche MCDA n°4 (V02-01/01/2019) Food contact ability of organic materials based on plant fibres intended to come into contact with foodstuffs
- Statutory Instruments 2012 No. 2619 Materials and Articles in Contact with Food (England) Regulations 2012 (state on 20.11.2012), Part 2, Section 4 (1)
- Scottish Statutory Instruments 2012 No. 318 Materials and Articles in Contact with Food (Scotland) Regulations 2012 (state on 28.3.2019), Part 2, Section 4 (1)
- Welsh Statutory Instruments 2012 No. 2705 (W.291) Materials and Articles in Contact with Food (Wales) Regulations 2012 (state on 26.07.2018), 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 on 20.11.2012), Part 2, Section 4 (1)

- Model Toxics Legislation as developed by the Source Reduction Council of CONEG of 14<sup>th</sup> of December 1989, last modification of February 2021, regarding heavy metals

## Information on additional Food Contact Regulations

### Regulation (EU) 10/2011

Above-mentioned paper grades are not subject to the Plastics Regulation (EU) 10/2011. Therefore, OML (overall migration), SML (specific migration limits) as well as testing conditions as listed in Regulation (EU) 10/2011, and subsequent amendments, do not apply to food contact materials made of paper. These products are tested for food contact application by the accredited third-party institute, [REDACTED] to comply with relevant food contact laws and regulations relative to paper.

### Analysis for compliance with the demands on food contact materials

Substances	Result	Detection limit	Method
PCP	Not quantifiable	<0,01 mg/kg dry matter	DIN EN ISO 15320:2011-08, report 05.08.2024
Methanal (Formaldehyde)	Not quantifiable	<0,004 mg/g dry matter	DIN EN 1541:2001-07, report 05.08.2024
Glyoxal	Not quantifiable	<0,005 mg/g dry matter	DIN EN 54603:2008-08, report 05.08.2024
Anthraquinone	Not quantifiable	<0,13 mg/kg dry matter	DIN CEN/TS 17630:2021-09; GCMS, 95% ethanol (v/v), report 05.08.2024
2- Ethylantraquinone	Not quantifiable	<0,13 mg/kg dry matter	DIN CEN/TS 17630:2021-09; GCMS, 95% ethanol (v/v), report 05.08.2024
Sum C <sub>14</sub> -C <sub>40</sub>	3,0 mg/g		SOP 160.200, GC-FID, report 05.08.2024



[REDACTED]



Substances	Result	Detection limit	Method
DCP	Not detected	< 2 µg/l water extract	LFGB, § 64, method B 80.56-2:2002-09, GCMS, report 05.08.2024
MCPD	Not detected	< 2 µg/l water extract	LFGB, § 64, method B 80.56-2:2002-09, GCMS, report 05.08.2024
PAA (Primary Aromatic Amines)	Not quantifiable	0,002 mg/l water extract	DIN EN 17163:2019-05, report 05.08.2024
Total fluorine (F)	59 mg/kg	< 20 mg/kg dry matter	SOP 162.200

### Microbiological testing

Microbiological purity is tested from the [REDACTED] paper grades as random sampling four times per year. Tested microbes are at minimum total bacteria, yeasts and molds, enterobacteria and E.coli.

The transfer of antimicrobial constituent from the paper is tested (EN 1104, Hemmhof test, report 05.08.2024) and considered as not detected.

## Raw material compliance assessments

### Reach

As paper is an article, [REDACTED] complies with EC) No 1907/2006 article 133, sub 1: Duty to communicate information on substances in articles: "Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance."

[REDACTED] is therefore committed to inform customers in case any of its articles would contain any substance listed in the REACH Candidate List of substances of very high concern in a concentration > 0,1 % weight by weight or substances listed in the Annex XVII, if the restriction is relevant for its article.



[REDACTED]  
[REDACTED]  
[REDACTED]





## Mineral oils (MOSH and MOAH)

Based on individual testing\* for the representative paper sample, migration in Tenax +70°C / 30 min

MOSH <0,6 mg/kg food

MOAH <0,15 mg/kg food

Calculation of results with surface-volume-ratio of 6 dm<sup>2</sup> / 1 kg food.

\* Migration of Mineral oil (MOSH/ POSH, MOAH) in Tenax (modified polyphenylene oxide resin) according to JRC (mod), were analyzed by subcontractor (30.12.2022) with internal test method using LC-GC-FID. The test method for migration of mineral oils has been accredited by DAkkS.

## Engineered nanomaterials

Engineered nanomaterial according to Regulation (EU) 2015/2283 are not intentionally added to above mentioned product. Some raw materials used in paper manufacturing may contain a share of particles in the nano range (size range 1nm – 100nm), although they are not engineered to be nanomaterials. Engineered nanomaterials (ENMs) are manufactured with particle sizes between 1 and 100 nm (nm) and are designed to have specific chemical and physical properties that are different than their conventional counterparts.

## California Proposition 65

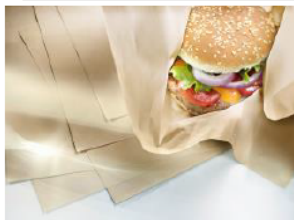
Above mentioned paper grades may contain titanium dioxide, which is listed in California Proposition 65 list. Additionally, some substances may be present in used raw materials and processing aids as trace level amounts. Separate statement available on request.

## Persistent Organic Pollutants (POP) according to Regulation (EU) No. 2019/1021

Paper articles mentioned above do not contain any intentionally added Persistent Organic Pollutants (POP) listed as banned or restricted under the Stockholm Convention in a concentration > 0,1 % weight by weight.

## Toxic Substances Control Act (TSCA)

Paper articles used for food contact are not regulated under TSCA. When above paper is used as food contact material, it is regulated under FDA 176.170 and 176.180 and excluded from the requirements of TSCA.





## Microplastics

According to Regulation (EU) 2023/2055 concerning the restriction of intentionally added synthetic polymer microparticles, microplastics are defined as particles containing a solid polymer, where  $\geq 1\%$  w/w of particles have (i) all dimensions  $\leq 5$  mm, or (ii), a length of  $0.3 \mu\text{m} \leq x \leq 15$  mm and length to diameter ratio of  $>3$ .

Synthetic polymers are typically used in the paper industry as additives or production aids (like sizing agents, retention aids, wet strength agents etc) to be able to deliver functional paper properties as well as maintain a consistent production process.

According to paragraph 5 in Annex of Commission Regulation (EU) 2023/2055, paragraph 1 shall not apply to the placing on the market of synthetic polymer microparticles, as substances on their own or in mixtures, if synthetic polymer microparticles are permanently incorporated into a solid matrix during intended end use. Products to be regarded as articles under REACH are exempted from the regulation. According to REACH regulation, paper is an article, and therefore, restriction does not apply to paper articles.

## Halal/Kosher

Substances originating from animals or ethanol are not intentionally added during the paper making process.

## Substance assessment

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

Alkyl phenols and alkylphenol ethoxylates

Allergens defined in regulation (EU) No 1169/2011 Annex II (Including Gluten). However, Sulphur dioxide ( $\text{SO}_2$ ) and Sulphites ( $\text{SO}_3$ ) are used in Sulphate/Sulphite pulping processes. \*

Asbestos

Azo dyes

Bisphenol A, B, F, S and AF

Endocrine disrupting compounds (EDC) as listed in United Nations identified 45 EDSs

Ethanol

Genetically modified organisms (GMO)

Latex

Optical brighteners (OBA)

Per- and polyfluoroalkyl substances (PFAS, incl. PFOS, PFOA)

Phthalates

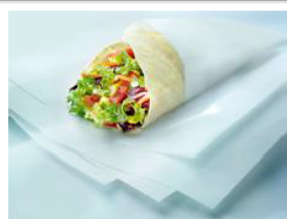
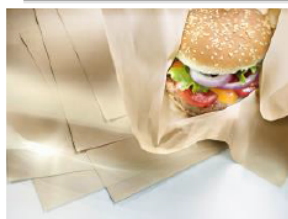
PVC, PVDC

Recycled raw materials

Substances of animal origin

Substances of very high concern (SVHC) above the threshold limit  $< 0,1 \%$  w/w

\*Based on theoretical calculations (using 1 kg food equals  $6\text{dm}^2$  packaging), the limit 10 mg/kg for food will not be exceeded.



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## Circular Economy and End of Life Status

### Recyclability

The product is recyclable, in its original form when leaving the mill, if the local appropriate collection and sorting is organized and the local appropriate infrastructure exist. The product confirms to Directive 94/62/EC on packaging and packaging waste concerning heavy metals. Product in its original form can be recycled under the suitable grade definition as defined in European list of Standard Grades of Paper and Board for Recycling, standard EN643.

Based on the 4 evergreen Circularity by Design Guideline (vr. 2, June 2023, table 4 and table 5.), above mentioned products do not contain raw materials which would not be fully and/or conditionally compatible with standard recycling process.

### Compostability and Biodegradability

Above mentioned products are not tested against any compostability standards.

Product confirms to Directive 94/62/EC on packaging and packaging waste and Model Toxics Legislation as developed by the Source Reduction Council of CONEG concerning heavy metals.

## Other

### Storage conditions and shelf life

Products have a shelf life with applicable paper properties and food contact safety of about 2 years from packing date if the product is stored in its original package in clean and dry environment and not in direct sunlight.

Products must be stored wrapped to avoid odor, dust, moisture, and direct sun. The general optimum conditions for the storage area of papers are at relative humidity 45-55% and the temperature around 22-24°C (71-76°F) and any contamination of the product must be avoided. However, [REDACTED] does not specifically analyze for the shelf life of the articles. Therefore, any exact shelf life of the products cannot be guaranteed.

### 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 reason, it can be renewed before the expiring date. The newer version is always the valid version. Document is valid without signature.



[REDACTED]  
[REDACTED]  
[REDACTED]

Page | 9

Nette GmbH  
Elliehäuser Weg 7-11, 37079 Göttingen  
Telefon: +49 551 69 47-0  
Telefax: +49 551 69 47-27  
E-Mail: [info@nette-deutschland.de](mailto:info@nette-deutschland.de)

Niederlassung Leipzig  
Oststraße 5, 06231 Bad Dürrenberg OT Nempitz  
Telefon: +49 3462 542 65-0  
Telefax: +49 3462 542 65-11  
E-Mail: [leipzig@nette-deutschland.de](mailto:leipzig@nette-deutschland.de)

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

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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.



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Page | 10

\*\*\*ENDE LEBENSMITTELUNBEDENKLICHKEITSERKLÄRUNG DES LIEFERANTEN\*\*\*

Nette GmbH  
Elliehäuser Weg 7-11, 37079 Göttingen  
Telefon: +49 551 69 47-0  
Telefax: +49 551 69 47-27  
E-Mail: info@nette-deutschland.de

Niederlassung Leipzig  
Oststraße 5, 06231 Bad Dürrenberg OT Nempitz  
Telefon: +49 3462 542 65-0  
Telefax: +49 3462 542 65-11  
E-Mail: leipzig@nette-deutschland.de

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

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