Certificate

Version: 1 Replaces version: 0 Date: July 22, 2011

Declaration of Compliance

Trade name

Product description Base board (PankaTray) grammage PET-coating

Fiber source Production site Trayforma BPET (black)

 (hereafter referred to as extrusion coated board) SBS Tray board
Ranges between 460 g/m² to 550 g/m²
The PET-coating on one side of the board.
Coating weights vary depending on specifications.
For more information see technical specification.
Virgin fiber
PankaTray is manufactured by Pankaboard Oy at Pankakoski and PET coating for Trayforma BPET is manufactured at Stora Enso Imatra Mills Stora Enso Oyj, Packaging, Imatra Mills

Producer

Specific instructions for safe and appropriate use

This extrusion coated board is intended for packaging dry, aqueous and fatty foodstuffs.

The information given in this certificate is based on written confirmations of our chemical and board suppliers as well as evaluations and analyses made by an independent research laboratory, Harlan Laboratories Ltd., Product Certification Services.

Please note that the PET coated side of the board is intended to be in contact with food.

This extrusion coated board is <u>suitable</u> for use under the following conditions of temperature and time. Please also see storage conditions.

- Freezer/fridge (-20 ℃ to 5 ℃ more than 24 hrs)
- Room temperature (up to 40 °C for more than 24 hrs)

With aqueous and fatty foodstuffs also

- Hot-fill (heating up to 70 ℃ for up to 2h or heating up to 100 ℃ for up to 15min)
- Microwave oven (600W / 3 min)
- Conventional oven (max. 220 ℃ and 30 min)

Food contact

We hereby declare that the extrusion coated board before conversion complies where applicable and under foreseeable conditions of use with the relevant requirements of;

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food



Raw materials

Paperboard

For the purpose to achieve high chemical and microbiological purity only virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms to established technology involving the use of generally recognized chemicals. All chemical additives used as raw materials for the paperboard are mentioned in the following regulations. Information below is based on the written confirmation of our board supplier.

The paperboard complies where applicable and under foreseeable conditions of use with;

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- German BfR Recommendation XXXVI, Paper and board (2007)
- German BfR Recommendation XXXVI/2, Paper and board (2007)
- US FDA CFR 21 §176.170: Paper and Paperboard Components (2008)
- US FDA CFR 21 §176.180: Paper and Paperboard Components (2008)

Plastic layer

All substances used as raw materials for the extrusion coating are mentioned where applicable in the following regulations. Information below is based on the written confirmation of our suppliers.

The substances used in the extrusion coating comply with the following regulations:

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- Commission Regulation (EU) 10/2011 on plastic materials and articles intended to come into contact with food

In addition the:

PET layer in direct contact with food complies with:

- BfR Recommendation XVII Poly(terephthalic acid diol esters)
- US Food Contact Notification (FCN) No 376

Masterbatch used in the extrusion coating complies with:

- German BfR Recommendation XVII Poly(terephthalic acid diol esters)
- German BfR Recommendation IX Colorants for plastics and other polymers used in commodities

Specific migration limits, SML

Substances used in the extrusion coating contain the following restrictions and specifications according to Commission Regulation (EU) 10/2011. It shall be noted that according to Commission Regulation (EU) 10/2011 specific migration limits and overall migration limit do not apply to plastic layers in multi-material multi-layer materials and articles.

Substance	CAS-number	SML in plastic (mg/kg food)
Terephthalic acid	100-21-0	7,5 mg/kg expressed as terephthalic acid *
Isophthalic acid	121-91-5	5,0 mg/kg expressed as isophthalic acid **
Ethylene glycol + Diethylene glycol	107-21-1 + 111-46-6	30 mg/kg expressed as ethylene glycol ***
Antimony trioxide	1309-64-4	0,04 mg/kg expressed as antimony



- * SML means that the restriction shall not be exceeded by the sum of the migration levels of the following substances mentioned as EEC Packaging material Ref. No 23187, 24910 and 24940.
- ** SML means that the restriction shall not be exceeded by the sum of the migration levels of the following substances mentioned as EEC Packaging material Ref. No 19150 and 19180
- *** SML means that the restriction shall not be exceeded by the sum of the migration levels of the following substances mentioned as EEC Packaging material Ref. No 13326, 15760, 16990, 47680, 53650 and 89440.

Dual Use Additives

The following additives are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 and according to our supplier may be present in the **substances used in the extrusion coating**:

Substance	E number

Phosphoric Acid E338

Analyses / Migrations

The overall migration tests have been performed on representative samples of **extrusion coated board** according to EN 1186-1, 1186-3 and 1186-13 with the following results. The contact area to volume ratio in the migration tests was 98 ml/dm². The overall migration limit 10 mg/dm² stipulated in the Commission Regulation (EU) 10/2011* is not exceeded.

Simulant	Contact time	Temperature (℃)	Results (mg/ dm ²)
3% Acetic acid	4 hours	100 <i>°</i> C	< 10
10% Ethanol	4 hours	Reflux	< 10
95% Ethanol	10 days	40 <i>°</i> C	< 10
Tenax	2 hours	225℃	< 10
Isooctane	2 days	20 <i>°</i> C	< 10

Compliance with SML limitations has been shown by worst case calculations and migration measurements according to EN 13130-2. The specific migration limits stipulated in the Commission Regulation (EU) 10/2011* are not exceeded.

Substance	CAS-number		SML in plastic (mg/kg food)	
Terephthalic acid	10	0-21-0	7,5 mg/kg expressed	d as terephthalic acid
Simulant	Contact time	Temperature (°C)	Results (mg/kg)	7
Olive oil	2 hours + 10 days	s 225℃ + 40℃	< 7,5	
Antimony trioxide Isophthalic acid Ethylene glycol + Diethy	1309-64-4 121-91-5 hylene glycol 107-21-1 + 111-46-6		< 0,04 mg/kg expres < 5,0 mg/kg express < 30 mg/kg express	ssed as antimony sed as isophthalic acid ed as ethylene glycol

* <u>Transitional provisions in Commission Regulation (EU) 10/2011</u>: Until 31st December 2012 the supporting documents referred to in Article 16 shall be based on the basic rules for overall and specific migration testing set out in the Annex to ECD 82/711/EEC (the old rules). As from 1st January 2013 the supporting documents referred to in Article 16 for materials and articles placed on the market until 31st December 2015 may be based on either the old rules (as above) or the new rules according to Commission Regulation (EU) 10/2011. As from 1st January 2016 the supporting documents referred to in Article 16 for materials and 16 shall be based on the new rules according to Commission Regulation (EU) 10/2011.



Analyses / Paperboard

Information below is based on the written confirmation of our board supplier.

Heavy metals in paperboard

The paperboard complies with the requirements in BfR Empfehlungen XXXVI, Paper and Board (2009).

Cadmium (Cd)	< 0,5	mg/kg dry matter
Mercury (Hg)	< 0,25	mg/kg dry matter
Lead (Pb)	< 1,1	mg/kg dry matter
Chromium (Cr)	< 1	mg/kg dry matter

Formaldehyde in paperboard

The **paperboard** complies with the requirements for formaldehyde in BfR Empfehlungen XXXVI, Paper and Board (2009). Analysis of formaldehyde has been performed on representative board samples according to EN 1541. The amount of formaldehyde in PankaTray is < 0,004 mg/kg dry matter.

PCP in paperboard

The **paperboard** complies with the requirements for pentachlorophenol (PCP) in BfR Empfehlungen XXXVI, Paper and Board (2009). Analyses have been performed on representative board samples for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP in PankaTray is < 0,005 mg/kg dry matter.

Optical Brightening Agent (OBA)

Optical Brightening Agents (OBA) are not used in the production of PankaTray. PankaTray samples have been tested with UV irradiation and results show " no optically brightened fibers".

Hemmhof test

The **paperboard** fulfils the requirements in BfR XXXVI. Determinations have been performed on representative board samples regarding the transfer of antimicrobial constituents according to EN 1104. There was no inhibition zone detected i.e there was no transfer of antimicrobial constituents.

Dioxin in paperboard

Dioxin is neither used as raw material nor intentionally added in the production of PankaTray.

Substances / Paperboard

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Information below is based on the written confirmation of our board supplier. Please note that we do not analyze the board for the substances listed below.

<u>GMO</u>

Based on the information received from raw material suppliers, none of the raw materials used by Pankaboard Oy contain any genetically modified organisms (GMO). Genetically modified organisms (GMO) are neither used as raw material nor intentionally added in production of PankTray board.



Food allergens

Regarding the Directive 89/2003 EC, Annex IIIa and US FDA Food Allergen Labelling and Consumer Protection AcT (FALCPA) there are three compounds relevant from a board producer to comment on, gluten, lactose and sulphite/SO₂.

Starch and starch containing chemical additives might be a source of gluten. Test results for gluten analyses of PankaTray show level of <5,0 mg/kg.

It is possible to find lactose in some sizing agents used i the board production. test results for lactose analyses of PankaTray show level of < 0,04g/100g.

In the production of pulp and board both sulphite and SO_2 are used as process chemicals. Test results on PankaTray show sulphite content below the detection limit of 4 mg/kg expressed as SO_2 .

Phthalates

We hereby confirm that no phthalates are intentionally added in the extrusion coating of PankaTray. This information is based upon information given by our polymer suppliers.

Additional legislation and regulations, not food related

<u>REACH</u>

The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of properties of chemical substances. The REACH regulation gives greater responsibility to industry to manage the risks from chemicals and to provide safety information on the substances. REACH requires an extensive information exchange in the supply chain in order to fulfill all obligations.

Our obligations in REACH are as a downstream user and as a manufacturer of substances and articles. To secure REACH compliance from our suppliers we have included REACH demands in our purchasing agreement. For the substances that we manufacture and where REACH demands registration we have done or we will do the registrations according to the timelines set in the REACH regulation.

Cellulose pulp is defined as a substance and exempted from registration according to appendix IV. Paper and board grades are defined as articles <u>without</u> intended release according to REACH. Consequently this means that registration doesn't apply for paper and board grades.

If any of our articles contains above 0.1% (w/w) of a **S**ubstance of **V**ery **H**igh **C**oncern that will be published on the <u>Candidate</u> <u>List</u> we will inform you as REACH requires. We continuously follow the development of the Candidate List and the substances for authorization. To our knowledge today none of our articles contain any **S**ubstance of **V**ery **H**igh **C**oncern that is on the Candidate List in a concentration above 0.1% (w/w).

Certified management systems at the production site/sites

Certificates are available on the internet: http://www.storaenso.com/sustainability/certificates/Pages/certificates.aspx

Board production ISO 9001 ISO 14001 ISO 22000 PEFC CoC Polymer coating ISO 9001 ISO 14001 ISO 22000 OHSAS 18001 FDA/IMS Compliance



Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 50-55 % relative humidity and 20-23°C. We recommend consumption within 12 months from manufacturing date and after this time rights of claims normally disappear.

Disclaimer

It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application. This certificate and its contents are subject to the following additional limitations and disclaimers:

- Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. 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.
- This certificate is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.
- This certificate is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.
- Nothing in this certificate shall be interpreted as a warranty (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.
- This certificate forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this certificate.
- No one other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party

22 July 2011 (Date of issue)

Quality Service Engineer (Position)

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(Signature)

Minna Kiviranta

(Clarification of signature)



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