

**Dr. Ralph Derra**

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

5 September 2023

Dr. Dr/Ils-har

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

60203 U 23

für  
for  
pour

Arctic Paper Kostrzyn S.A.  
ul. Fabryczna 1  
66-470 Kostrzyn nad Odrą  
Poland

Produkt  
Product  
Produit

Amber Graphic  
Amber Preprint

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

They were examined by us according to 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),

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, a determination of the heavy metals content according to

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

and determinations of dyestuffs and primary aromatic amines according to

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

have been performed.

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 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).

Furthermore the paper grades are in compliance with the demands of

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

regarding the content of the mentioned elements and of

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

regarding the contents of dyestuffs, formaldehyde and primary aromatic amines.

Furthermore the paper grades are in compliance with the Swiss regulations of the

SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) vom 16. Dezember 2016, (Stand am 15. Juli 2022), Artikel 49,

(SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (state on 15 July 2022), article 49),

as well as of the

SR 817.023.21 Verordnung des EDI über Bedarfsgegenstände vom 16. Dezember 2016, (Stand am 15. Oktober 2022), Artikel 27,

(SR 817.023.21 Ordinance of the FDHA on Materials and Articles of 16 December 2016 (state on 15 October 2022), article 27).

Thus the paper grades **Amber Graphic** and **Amber Preprint** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry and non-fatty foodstuffs and such kind of foodstuff which are peeled, shelled or washed before consumption.

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



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