

February 23, 2017

Declaration of Compliance

<i>Trade name:</i>	VivaLiner (hereafter referred to as the paper)
<i>Product description:</i>	Paper
<i>Basis weight:</i>	Range from 120 to 190 g/m ² For more information see technical specification.
<i>Fiber source:</i>	Virgin fiber
<i>Bleaching:</i>	All used pulps are elementary chlorine free (ECF-pulps)
<i>Producer:</i>	Feldmuehle Uetersen GmbH

Instructions for safe and appropriate use

This paper is intended for packaging food and may stand in direct contact with dry and fatty foodstuffs. This paper is intended for use under the following conditions of temperature and time. Please also see storage conditions.

- Freezer/fridge
- Room temperature (up to 40°C for more than 24 hrs)
- Hot-fill (BfR XXXVI 90°C)

This paper is not intended for use under the following conditions and temperatures

- Microwave oven
- Conventional oven

When converting this paper each part of the converting chain is responsible for the suitability for the intended end-use.

The information given in this certificate is based upon written confirmation from our chemical suppliers as well as analysis performed on representative paper samples.

Compliance with European food contact legislation

Only virgin fibers and food contact approved chemical additives are used as raw material in the production of paper. 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 paper are mentioned where applicable in the following regulations. Information below is based on the written confirmation of our chemical suppliers and analysis performed on the paper.

The paper complies where applicable and under foreseeable conditions of use with:

- Regulation (EC) No 1935/2004 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
- BfR Recommendation XXXVI, Paper and board

Industry Guideline

The Industry Guideline for the Compliance of Paper and Board Materials and Articles for food contact provides harmonized approach for self-regulation of paper and board. Feldmuehle supports and operates according to the Industry Guideline. More information on the guideline can be found on the following web site; <http://www.cepi.org/mediacentre/publications>

Analyses

Analyses have been performed on representative samples of paper.

- Colour fastness:

Analysis has been performed according to EN 646. There was no visible transfer (grade 5) for any of the test fluids.

- Fluorescent whitening agents:

Analysis has been performed according to EN 648. There was no visible transfer (grade 5) for olive oil simulant.

- Formaldehyde:

Analysis has been performed according to EN 1541. The amount of formaldehyde is with 0,12 mg/dm² far below the limit of 1,00 mg/dm².

- Migration of certain 19 elements according EN 71-3 (toy safety):

The analyses have been done according to DIN EN 71-3:2013. The representative samples of paper passed the test.

- Preservatives:

Analyses have been performed according to Eurofins internal test method. There were no preservatives detectable.

Substances

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. Please note that we do not analyze the paper for the substances listed below. Information below is based upon information given by our chemical suppliers.

- Animal origin:

We hereby confirm that no additive of animal origin is intentionally added in the production of paper.

- BSE:

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and Creutzfeldt Jakob Disease, JCD is intentionally added in the production of paper.

- Food allergens:

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Commission Directive 2007/68/EC, the following food allergens or products derived thereof are not intentionally added for the manufacture of paper:

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof
- Nuts and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂.
- Lupin and products thereof
- Molluscs and products thereof

Consequently the products may reasonably be expected not to contain allergenic proteins.

- GMO:

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the production paper. Our suppliers can however not exclude adventitious and technically unavoidable contamination**.

* http://ec.europa.eu/food/food/biotechnology/index_en.htm

** Regulation 1830/2003 on traceability and labeling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

- Phthalates:

We hereby confirm that no phthalates are intentionally added in the production of paper.

- Pollutants and toxic substances:

We do not use the following substances in our recipes:

- Polychlorinated biphenyls (PCB)
- Polyaromatic amines
- Pentachlorophenole, halogenated solvents or other chlorine hydrocarbons
- Benzophenone, methylbenzophenone or Michlers ketone
- Anthrachinone, Bisphenol A and Bisphenol S

Additional legislation and regulation, not food related

- REACH:

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. Our paper and paperboard grades are defined as articles without intended release according to REACH. Consequently this means that registration doesn't apply for our paper and paperboard grades.

If any of our articles contains above 0.1% (w/w) of a Substance of Very High Concern that will be published on the Candidate List 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 Substance of Very High Concern that is on the Candidate List in a concentration above 0.1% (w/w).

- Safety of toys:

We hereby confirm that the paper before conversion complies to the European Standard EN 71-3:2013, Safety of toys – Part 3 with amendment A1: Migration of certain elements and European Standard EN 71-9. Organic chemical compounds. This information is based upon information from our suppliers and upon analyses performed on the paper.

- EU-Timber:

Feldmuehle Uetersen GmbH fulfills the obligations of the European Union Timber Regulation (No 995/2010), which prohibits the placing and trading of illegally harvested timber and timber products on the EU market. Feldmuehle Uetersen GmbH applies the Due Diligence procedures as part of the FSC® and/or PEFC™ Chain of Custody and traceability systems.

- 94/62/EC for packaging

We hereby confirm that the paper fulfills the EN requirement for sum concentration for lead, cadmium, mercury and hexavalent chromium, which shall not exceed 100 ppm.

Certified management systems at the production site

Feldmuehle Uetersen GmbH is certified according to the following standards

- ISO 9001
- ISO 14001
- ISO 50001
- OHSAS 18001
- FSC® CoC
- PEFC CoC

Storage and handling requirements

In order to secure and ensure product safety and quality the product must be well wrapped and stored indoor under normal conditions and good protection, sheltered from rain and snow. We recommend converting of the paper 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 Feldmuehle Uetersen GmbH.
- 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.



Eitze
Quality Manager