



# Declaration of Compliance

Issued by:

Mondi SCP a.s.  
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(hereinafter 'Mondi')

To:

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This document constitutes the declaration of compliance and contains the appropriate information to demonstrate compliance with the hereinafter Regulation(s). The data provided herein shall be used by the recipient to establish its own declaration of compliance for products from subsequent stages of manufacturing or for the final article, if required by the applicable laws. The recipient shall not forward this document as such to third parties. Any detailed test results, calculations, or other technical data provided separately constitute supporting documentation and shall be treated as confidential, to be made available only to national competent authorities on request.

## Paper grade

Offset paper (hereafter 'paper')

Maestro Print

## Composition

The 'paper' delivered by 'Mondi' is a 100% pure virgin fiber paper grade and no post-consumer or post-industrial recycled materials are included.

## Description of Application

The 'paper' can be used safely for food packaging application of the following foodstuffs:

| Name                                                                                                                                                                         | Market |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| direct contact with dry and that kind of fatty foodstuffs, which are assigned to a correction factor of minimum 2 according to Annex III, Table 2 of Regulation (EU) 10/2011 | DE     |



| Name                                                                             | Market |
|----------------------------------------------------------------------------------|--------|
| for low grammages (up to 100 g/m2) of the paper: direct contact with fatty foods | DE     |

Regulations and Guidelines

We confirm that the 'paper' complies with the requirements of the following regulations, directives and recommendations:

| Regulation Nr        | Name                                      | Issue Date | Description                                                                                                                                                                                                        | Country |
|----------------------|-------------------------------------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| Directive            |                                           |            |                                                                                                                                                                                                                    |         |
| 94/62/EC             | Directive 94/62/EC - 20.12.1994           | 1994-12-20 | European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste.                                                                                                           | EU      |
| Regulation           |                                           |            |                                                                                                                                                                                                                    |         |
| (EC) No 1907/2006    | Regulation (EC) No 1907/2006 - 18.12.2006 | 2006-12-18 | REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)                         | EU      |
| (EC) No 1935/2004    | Regulation (EC) No 1935/2004 - 27.10.2004 | 2004-10-27 | 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 | EU      |
| (EC) No 2023/2006    | Regulation (EC) No 2023/2006 - 22.12.2006 | 2006-12-22 | COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice (GMP) for materials and articles intended to come into contact with foods                                               | EU      |
| TPCH 2021 (CONEG)    | Regulation TPCH 2021 (CONEG) - 01.02.2021 | 2021-02-01 | Model Toxics in Packaging Legislation (formerly CONEG)                                                                                                                                                             | US      |
| Standard             |                                           |            |                                                                                                                                                                                                                    |         |
| EN 71-3:2019+A2:2024 | Standard EN 71-3:2019+A2:2024 (DIN EN 71- | 2021-04-14 | Safety of toys - Part 3: Migration of certain elements                                                                                                                                                             | EU      |

| Regulation Nr                   | Name                                                      | Issue Date | Description                                                                                                                                                                                | Country |
|---------------------------------|-----------------------------------------------------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| (DIN EN 71-3:2025-02)           | 3:2025-02) - 14.04.2021                                   |            |                                                                                                                                                                                            |         |
| Decree                          |                                                           |            |                                                                                                                                                                                            |         |
| no 2007-766                     | Decree no 2007-766 - 10.05.2007                           | 2007-05-10 | Décret no 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 | FR      |
| Notification                    |                                                           |            |                                                                                                                                                                                            |         |
| Fiche MCDA n°4 (V02-01/01/2019) | Notification Fiche MCDA n°4 (V02-01/01/2019) - 01.01.2019 | 2019-01-01 | Suitability of organic vegetable fibres foreseen to be in contact with food - Fiche MCDA n°4 (V02-01/01/2019) DGCCRF 2017 (Paper and cardboard sheet)                                      | FR      |
| Recommendation                  |                                                           |            |                                                                                                                                                                                            |         |
| XXXVI/BfR (2025)                | Recommendation XXXVI/BfR (2025) - 01.10.2025              | 2025-10-01 | Paper and board for food contact                                                                                                                                                           | DE      |

## Decreto Ministeriale 21 marzo 1973

The marketability in Italy is given by the Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.04.1973, art. 38-bis, last amended on 14 November 2019.

## Statements regarding Regulations and Guidelines

### Regulation (EC) 1935/2004 - on materials and articles to come into contact with food

Due to missing European legal documents (specific measure) for paper and board based food contact materials, the compliance of the 'paper' is given by fulfilling the requirements of the German Recommendation XXXVI for the given application - please see 'Description of Application'.

### Regulation (EC) 2023/2006 - on good manufacturing practise for materials and articles intended to come into contact with food

The hygiene management system at 'Mondi' follows the requirement of the Food Safety System Certification 22000 (FSSC 22000), which is externally verified on a regular basis, thereby fulfilling the GMP requirements according to Regulation (EC) 2023/2006.

The hygiene management system at 'Mondi' follows the requirement of the food safety management standard ISO 22000, which is externally verified on a regular basis, thereby fulfilling the GMP requirements according to Regulation (EC) 2023/2006.

## **Regulation (EC) 1907/2006 - concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)**

The 'paper' produced by 'Mondi' is regarded as 'article' and no REACH registration is needed. All suppliers of chemical products to 'Mondi' have confirmed their obligation of information towards 'Mondi' in case of any REACH relevant changes in their product composition. 'Mondi' confirms to fulfil its obligations of immediately informing your company on all REACH relevant changes on the produced product according to Reg (EC) 1907/2006, article 33. This duty on information includes also compliance with the limit values of less than 0.1 weight percent for substances listed in the ECHA Candidate List of Substances of Very High Concern (SVHC list) as last amended.

## **Reg(EU) 2025/40 - on packaging and packaging waste (PPWR)**

### **Heavy Metals**

The 'paper' produced by 'Mondi' fulfils the requirements of heavy metals (the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging and packaging components shall not exceed 100 ppm by weight) of the PPWR.

### **Per- and polyfluorinated alkyl substances (PFAS)**

PFAS, a substance group of more than 10.000 different compounds, are widely used in numerous industrial processes and consumer products due to their special technical properties.

On Dec 19th 2024 the European Commission has signed-off the PPWR proposal, which has been published on Jan 22nd 2025 and shall apply from Aug 12th 2026 (except Article 67(5) shall apply from Feb 12th 2029). According to Article 5(5) food contact packaging shall not be placed on the market if it contains PFAS in a concentration equal or above the following limits:

- 25 ppb (parts per billion) for any individual PFAS compound measured using targeted analysis (polymeric PFAS excluded from quantification)
- 250 ppb for the sum of PFAS compounds measured as the sum of targeted PFAS analysis, where applicable with prior degradation of precursors (polymeric PFAS excluded from quantification)
- 50 ppm (parts per million) for total fluorine originating from PFAS sources (including polymeric PFAS)



On Mar 30th 2026, the guidance document 'Approval of the draft Commission Notice on the Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste' was officially published. This document specifies that PFAS compliance is assessed using a stepwise approach, including the determination of total fluorine (TF) and/or organic fluorine as initial screening parameters. Materials and articles with levels below the threshold of 50 ppm are considered compliant with the PFAS restriction requirements of the PPWR.

With reference to this guidance, we confirm that the 'paper' fulfils the fluorine criteria of the PPWR, as determined using appropriate analytical methods.

Directive 94/62/EC - on packaging and packaging waste

The 'paper' produced by 'Mondi' fulfils the requirements of heavy metals (the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging and packaging components shall not exceed 100 ppm by weight) of the PPWD 94/62/EC and of Reg (EU) 2025/40 on packaging and packaging waste.

Comment - Reg(EU) 2025/40 'on packaging and packaging waste, amending Reg(EU) 2019/1020 and Dir(EU) 2019/904, and repealing Dir 94/62/EC' (PPWR). On the Dec 19th 2024 the European Commission has signed-off the PPWR proposal, which has been published on 22th Jan 2025 and shall apply from Aug 12th 2026 (except Article 67(5) shall apply from Feb 12th 2029)

German Recommendation XXXVI - on paper and board for food contact (BfR)

The 'paper' may be used safely for the given application - please see 'Description of application'.

Comment - The BfR Rec XXXVI limits the contact of paper or paperboard to temperatures up to 90°C. For special applications (e.g. higher temperature range) the respective special recommendation (e.g. BfR Rec XXXVI/1, XXXVI/2) has to be verified.

Restricted Substances

The given limits of all paper significant restricted substances listed in the German Recommendation XXXVI are fulfilled for the given application/s - please see 'Description of application'.

Dual Use Substances

| Name              | CAS          | FCM | E-No     |
|-------------------|--------------|-----|----------|
| ADIPIC ACID       | 0000124-04-9 | 303 | E 355    |
| BENTONITE         | 0001302-78-9 | 393 |          |
| CALCIUM CARBONATE | 0000471-34-1 | 21  | E 170    |
| CELLULOSE         | 0009004-34-6 | 553 | E 460 II |
| CITRIC ACID       | 0000077-92-9 | 139 | E 330    |



| Name                   | CAS          | FCM | E-No    |
|------------------------|--------------|-----|---------|
| GLYCEROL               | 0000056-81-5 | 103 | E 422   |
| POLYETHYLENEGLYCOL 200 | 0025322-68-3 | 638 | E 1521  |
| QUARTZ                 | 0014808-60-7 | 616 | E 551   |
| SILICON DIOXIDE        | 0007631-86-9 | 504 | E 551   |
| SODIUM BISULPHITE      | 0007631-90-5 | 505 | E 222   |
| SODIUM CARBONATE       | 0000497-19-8 | 21  | E 500 I |
| SODIUM HYDROXIDE       | 0001310-73-2 | 400 | E 524   |
| SODIUM SULPHITE        | 0007757-83-7 | 516 | E 221   |
| XANTHAN GUM            | 0011138-66-2 | 596 | E 415   |

Limitations

The use of the 'paper' is verified to be compliant for the applications listed in 'Description of application', for other applications please get in contact with Mondi.

Disclaimer

Reels made out of the 'paper' should be stored wrapped and in a good ventilated storehouse according to the recommended conditions (temperature between 15°C and 25°C, relative air moisture between 50% and 70%). Before converting, materials should be acclimatized to predominant conditions at converting line(s). Reels which have not been fully used should be repacked similar to conditions delivered. Reels should be protected from strong radiation by heating systems.

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**This statement is valid until 17/06/2027. It replaces all previous versions and remains valid until expired or replaced by a newer version.**