

## Declaration of Compliance

<b>Product</b>	<b>Siliconised unbleached baking paper.</b>
<b>Trade name and code</b>	Silidor® Golden BP188, Silidor® Golden Parchment BP117, Silidor® Golden Parchment Top BP299, Eco-Bake® Golden 213, Silidor® 1 Golden BP110, Single Proof Golden FC211, Golden 1FC FC212.
<b>Production site</b>	Nordic Paper Seffle, Forskningsvägen 2 SE-66129 Säffle, Sweden
<b>Website</b>	www.Nordic-Paper.com
<b>Fibre source</b>	Virgin fibres
<b>Bleaching</b>	Unbleached
<b>Product description</b>	Environmentally friendly unbleached one or two side silicone treated natural greaseproof paper with excellent heat stability
<b>Typical end-use</b>	See technical specification for each grade.

Nordic Paper (NP) achieves grease barrier by mechanically processing the fibers using beaters, a process that allows fibers to bond closer together. This dense structure of cellulose fibers prevents grease from penetrating the paper and is what we refer to as "Natural Greaseproof".

### Compliance with European food contact legislation

We hereby certify that, for the purpose of high chemical and microbiological purity, only virgin fibre and food contact approved chemical additives are used as raw material in our production of greaseproof paper grades. The pulp and paper manufacturing process conform to established technology involving the use of generally recognized chemicals.

We hereby declare that the product complies where applicable and under foreseeable conditions of use with:

- Regulation (EC) 1935/2004 on materials and articles to come into contact with food with regards to raw materials and additives.
- Regulation (EC) 2023/2006 on good manufacturing practise (GMP) for materials and articles intended to come into contact with food.

### Compliance with US food contact legislation

FDA, CFR (Code of federal regulations) 21 Food and drugs, USA  
 § 176.170 "components of paper and paperboard in contact with aqueous and fatty foods"  
 § 176.180 "components of paper and paperboard in contact with dry food"

Condition of use, Table 2 Test procedures with time temperature conditions etc.: A, B, C, D, E\*, F\*, G and H, all type of foods

\*exception, Table 1 Types of raw and processed foods, VI Beverages A and C containing alcohol  
 Extractable matter was determined according to FDA 21 CFR §176.170  
 Test conditions - Condition of use: A. High temperature heat-sterilized (e.g. over 212°F)

Solvent	Test conditions	mg/inch <sup>2</sup>
Heptane	2 hours 66°C (150°F)	<0,1
Water	2 hours 121°C (250°F)	<0,1

Typical values according to analytical results from RISE INNVENTIA AB, reference report reference 2020-0084.

## Compliance with Germany Recommendations for food contact

Recommendations for food contact BfR (Empfehlungen des Bundesinstitutes Für Risikobewertung), Germany

- XXXVI. Paper and board for food contact
- XXXVI/2. Paper and paperboard for baking Purposes

This paper grade also meets the analytical requirements included in BfR XXXVI/I. Thus, this paper grade may safely be used in packages or other products intended for direct contact with dry, moist and fatty foodstuffs, as well as for baking purposes in conventional ovens up to a temperature of 220°C and storage at, or below room temperature down to -20°C.

### Overall Migration

BfR use the plastic directive (EC)10/2011. The overall migration limit to food simulant, according to regulation (EC)10/2011 shall not exceed 10 mg/dm<sup>2</sup>(assumption that 1kg food is packed in 6 dm<sup>2</sup>). Based on information from suppliers, there are specific migration limits (SML) to be followed and controlled. To confirm the paper product is without other SML, a 10 ppb screening is performed.

Determination of migration from paper using modified polyphenylene oxide (MPPO, food simulant E) was performed according to EN 14338. Quantification by GC/HRMS.

Simulant	Test conditions	mg/kg simulant	mg/dm <sup>2</sup>
MPPO	10 days, -20°C and 30 min, 220°C	1,16	0,19
MPPO	10 min, 250°C	0,31	0,05

Typical values according to analytical results from RISE INNVENTIA AB, reference report reference 2020-0084.

The overall migration test covers direct contact with dry, moist and fatty foodstuff as well as for baking purposes in conventional ovens up to a temperature of 220°C and storage at, or below room temperature down to -20°C. For the use in microwave ovens a temperature of 150 °C must not be exceeded.

## Compliance with French food contact legislation

Decree n° 2007-766 with supplement of decree n° 2008-1469

Silicone treated paper grades is considered as "non uniform coated", according to the classification of uncoated papers of the DGCCRF Fiche MCDA No.4 for papers in contact with foodstuffs.

## China GB 4806.8-2016 National Food Safety Standard

Approved according to National Standard of the People's republic of China, GB 4806.8-2016 National food safety standard- Food contact paper and board material and their products.

According to information from our suppliers, some additives used in our manufacturing process are not recognized at the positive list, GB 9685-2016 National Food Safety Standard: Standard for use of additives in food contact materials and articles.

## Additional legislation and regulations, not food related

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

- The sum lead, cadmium, mercury and hexavalent chromium in the paper product is less than 100 ppm(EN13428).
- The level of hazardous substances to the environment in the paper product is less than 0,1% (EN13428).

The paper product is suitable by recovery by:

- Material recycling (EN13430).  
Test performed according to standard "UNI 11743:2019" and results assessed in accordance with the "Aticelca Evaluation Method 501:2019" and classified the siliconized baking papers as Level B(Standard) or C(wet strength/Parchment).
- Energy recovery (EN13431).
- Biodegradable/compostable (EN 13432)
  - The external tests were confirmed to be degraded to 92% after 125 days. The requirements according to A.2.2.2 in EN 13432 states that at least 90% of the material shall be biodegraded within 6 months (180 days) Performed by Swedish Technical Research Institute of Sweden according to ISO 14855-1:2005.
  - According to our acknowledge of our raw materials added in our manufacturing process and knowing of analysis results of heavy metals of our products, which show our paper products also are compostable.

Industrial and Home compostable certified products

- Ongoing process (TÜV Austria) to have all products certified, which according to plan be complete Q2-2022.

## REACH (Registration, Evaluation, Authorisation and restriction of Chemicals)

All chemicals used within the EU are now subjected to regulations EC 1907/2006 (REACH) and EC 1272/2008 (CLP).

Regarding substances on ECHA's Candidate List (Substances of Very High Concern), none of these specified chemicals are used in our production of pulp and paper.

The list is monitored regularly, but it is highly unlikely that any of the chemicals we utilize in our production will be put on the Candidate list.

Regarding Chemsec SIN list, none of these specific substances are used as ingredients in the production of our products.

Therefore, according to our current knowledge, none of our products will have to be withdrawn from the market, and no reformulations are necessary to comply with REACH and Chemsec SIN list.

### Endocrine disruptors, The ED Lists ~~Feil!~~ Hyperkoblingsreferansen er ugyldig.;

List I: Substances identified as endocrine disruptors at EU level

List II: Substances under evaluation for endocrine disruption under an EU legislation

List III: Substances considered, by the evaluating National Authority, to have endocrine disrupting properties

## Kosher and comments about Halal

The product is certified by Star-K and is Pareve with Passover.

Based on our knowledge and information from our suppliers, we hereby confirm, that we do not use any ingredients of animal origin or alcohol in our manufacturing process of our products. This means it meets the criteria for Halal.

## MOSH and MOAH

According to our knowledge and based on information from our suppliers, we do not add any MOSH (mineral oil saturated hydrocarbons) or MOAH (mineral oil aromatic hydrocarbons) during the manufacturing process to any of our products.

The total amount of mineral oil in our paper products has been verified and tested to confirm above, by RISE Innventia and CTP (France) with results, not detected.

## Substances

Based on information from our suppliers we do not add any of the below substances during the manufacturing process of our products.

- NIAS (Non-Intentionally added substances).
- GMO (Genetically modified substances)
- Phtalates
- Optical Brighteners
- Bisphenol (including A, B and S)
- Fluorochemicals
  - We hereby certify that no fluorochemicals of any kind are added to any of our paper grades or used during the manufacturing process of our

products. However, traces of fluorochemicals can be detected in any paper grades included ours, caused by nature itself, has been polluted already. Organic fluorine can be detected for example in wood raw material (cellulose fibers) and water. The Danish authorities (Miljø- og Fødevareministeriet) now prohibited PFAS in food contact materials effective from July 2020. Values below 20 µg/g paper shall be considered as background value and to ensure the paper product are not treated with organic fluorochemicals.

- We also follow the commission regulation (EU) 2017/1000 – ‘AMENDING annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards perfluorooctanoic acid (PFOA), its salts and PFOA – related substances

## Food Allergens EU no. 1169/2011

Based on information from our suppliers, none of the allergens listed below are used in our manufacturing process.

### **Annex II** SUBSTANCES OR PRODUCTS CAUSING ALLERGIES OR INTOLERANCES.

1. Cereals containing gluten,
2. Crustaceans
3. Eggs
4. Fish
5. Peanuts
6. Soybeans
7. Milk
8. Nuts
9. Celery
10. Mustard
11. Sesame
12. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg.\*
13. Lupin
14. Molluscs

\*Test done by RISE Innventia.

## Guideline for storage and handling

To have the optimized conditions for our paper, we recommend these guidelines for storage.

### Warehouse:

- Stored in a dry location with the packaging.
- No exposure to sunlight
- Storage at room temperature to reduce conditioning time.
- Reels to be stored vertically
- Max. 3 years with packaging.

## Before use:

- Storage time in production area prior to production depends on the difference between storage temperature and humidity in warehouse and production area. It is important the reels have the same temperature and humidity as the production area. Minimum 24 hours prior to production.
- With packaging until it will be used.
- For hygiene purpose we recommend removing 2 layers of paper product.
- Our experience is that a moister climate works better when converting, and that it should be controlled over the seasons.

## Traceability

To ensure traceability from the customer back to our raw materials used in production all reels has a label on the core with relevant information.

Reel ID is the best information to trace.



### Explanation of Reel ID

- PGR = Production site
- 04 = Paper machine
- 20210126 = YYYYMMDD
- 0003 = Jumbo reel
- 2 = Set (length)
- 2= Position CD (cross machine direction)

## Additional information.

Based on the analytical results from testing the paper grade mentioned above, and specifications, supplied by Nordic Paper, Säffle and Greåker this paper grade is judged to meet the requirements of the regulations referred to above for direct contact with dry, moist and fatty foodstuff. The specifications cover the raw materials, the production aids and the special paper refining agents used in the production process.

### Silicone Treatment

The silicone treatment is not considered as a plastic according to the Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come in contact with food, which excludes silicone materials from its application field.

Based on documentation from the supplier, silicone treatment used for the products in this DoC could be considered as non-plastic and outside the scope of the DIRECTIVE (EU) 2019/904 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.

### Mutual recognition (EU) 2019/515

Mutual recognition is based on the idea that once a product has been tested and lawfully manufactured according to above regulations it is presumed to be approved in other countries.

Nordic Paper is certified according to management system:

- ISO 9001
- ISO 22000

All products are available as:

- FSC Mix
- 100%FEFC

Nordic Paper is certificated against FSC® (FSC-C102767) and PEFC (PEFC/05-33-213), for sustainability and socially acceptable harvesting practice. Re-planting of the forest is also required and regulated by the Swedish Forestry Act (Swedish Authorities).

Sign	Date
 Aleksander Andersen / Technical Support	 Valid for 1 years 20.06.2022 