

## Declaration of Compliance

Date of issue	2020-05-14
Addressee	Swedboard
Document No	DoCMH20064
Product name	Invercote GP + LDPE
Product description	Virgin fibre solid bleached board (SBB) on one side coated with mineral coating or with extruded low density polyethylene (LDPE) and on another side coated with extruded LDPE. In this product, LDPE layer is a barrier and is intended to be in contact with food, i.e. it is a food-contact layer.
Product specifications	Product specifications vary depending on the desired properties; for more information see Product Catalogue or Technical Specifications.
Manufacturer	Paperboard: Iggesund Paperboard AB, Iggesund Mill, SE-825 80 IGGESUND, Sweden  Lamination/extrusion: Iggesund Paperboard AB, Strömsbruk Mill, SE-820 72 STRÖMSBRUK, Sweden
Intended use of the Product	Dry, fatty, aqueous, acidic and alcoholic food.
Enduse	Food

### Material compliance with FCM legislation in EU

Food-contact side of this product before conversion from a regulatory point of view is in compliance with the following relevant food contact material (FCM) legislation:

- Regulation (EC) No 1935/2004 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. The manufacturing process of this product is in compliance with CEPI GMP guidelines;
- Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food and its subsequent amendments:
  - Confirmation  
According to our chemical suppliers' declarations, LDPE of this product is manufactured according to the Regulation (EU) No 10/2011 requirements using entirely materials (monomers, starting substances, etc.) listed therein<sup>1</sup>, and meets the requirements laid down in Article 3, 11(5) and 17 of the Regulation (EC) No 1935/2004.
  - Restricted substances  
LDPE of this product does not contain any substances with specific migration limits defined in the Regulation (EU) No 10/2011.
  - Dual use additives  
According to our chemical suppliers' declarations, substances authorized as food additives are not present in LDPE of this product.

<sup>1</sup>According to the Regulation 10/2011, a paperboard combined with a plastic material is called a multi-material multi-layer article (MMML). The plastic layer in MMML should comply with the same compositional requirements as the plastic layer which is not combined with other materials (Article 14. 1.); neither Specific Migration Limits (Article 11) nor Overall Migration Limits (Article 12) of this Regulation are applicable to plastic layers in MMML materials and articles (Article 14. 4.).

Normally, under the foreseeable conditions of this product use (when plastic layer is in contact with food) there will not be any migration of substances, which might be harmful to health or affect taste or smell of the foodstuff, from the paperboard layer into food.

## Paperboard

In this product, paperboard itself before conversion from a regulatory point of view is in compliance with the following national FCM legislation in Europe for dry and/or fatty food:

- German Law: German Food and Feed Code section 5 § 30 and § 31, and BfR XXXVI recommendation on paper and board for food contact, as of 01.06.2019;
- French Law: DGCCRF of 01.05.2016 (DM/4B/COM/004), Decree n° 2007-1467, Decree n° 2007-766, Decree n° 2008-1469, Decree n° 2011-828, Decree n° 92-631, Decree n° 2012-1442;
- Italian Law: Ministerial Decree D.M. 21/03/1973, Presidential Decree D.P.R. 23/08/1982 n° 777, Ministerial Decree D.M. 26/04/1993 n° 220 (transposition of Council Directive 85/572/EC) and their amendments;
- Swiss Law: The Federal Law on Foodstuffs and Consumer Goods (817.0) - Ordinance on Foodstuffs and Utility Articles (SR 817.02) of 16 December 2016, Ordinance on Materials and Articles in Contact with Food (SR 817.023.21) of 16 December 2016.

From a regulatory point of view it is only the reverse side (without mineral coating) of this paperboard compliant with the legislation mentioned above and suitable to be in contact with aqueous food. It is the responsibility of the converter to design the packaging in such way that during its usage aqueous food would not come into contact with the print side of this paperboard.

## Material compliance with FCM legislation in United States

PE layer in this product before conversion from a regulatory point of view is in compliance with the Food and Drug Administration's (FDA) title 21 of Code of Federal Regulation's (21 CFR) §177.1520 Olefin polymers part (c), paragraph 2.2.

Paperboard layer in this product is composed of raw materials which are in compliance with FDA, 21 CFR, §176.170 Components of paper and paperboard in contact with aqueous and fatty foods and §176.180 Components of paper and paperboard in contact with dry food.

## Non-food compliance

This product before conversion from a regulatory point of view is in compliance with:

- European Parliament and Council Directive 2009/48/EC and its subsequent amendments on the safety of toys. This product complies with all relevant restrictions laid down in this directive and fulfills requirements of standards Safety of toys - Part 3: Migration of certain elements (EN 71-3) and Safety of toys - Part 9: Organic chemical compounds - Requirements (EN 71-9);
- European Parliament and Council Directive 94/62/EC on packaging and packaging waste.
- Regulation (EC) 1907/2006 concerning the registration, evaluation, authorization and restriction of chemicals (REACH). Iggesund Paperboard will ensure that this product meets the requirements of REACH at such level that it does not contain either substances of very high concern (SVHC) in concentrations above 0.1 % as defined in REACH article 57 or certain dangerous substances listed in Annex XVII. In addition, Iggesund Paperboard is maintaining close contact with all its suppliers to ensure that chemicals purchased for use in the paperboard manufacturing process comply with the requirements of REACH.

## Final use

When testing overall migration according to the Regulation (EU) 10/2011 procedures, this product does not transfer its constituents to food simulants (when plastic layer is in contact with food simulants) in quantities exceeding 10 mg/dm<sup>2</sup> of food contact surface under the following conditions:

- 3 % acetic acid for 10 days at 40 °C;
- 95 % ethanol for 10 days at 40 °C;

The food-contact side of this product is therefore suitable to be in contact with all types of food (when plastic layer is in contact with food) under the following conditions:

- Freezing and refrigeration;
- Long term storage at room temperature or below;
- Hot-fill or heating up to  $70\text{ }^{\circ}\text{C} \leq T \leq 100\text{ }^{\circ}\text{C}$  for maximum  $t = 120/2^{((T-70)/10)}$  minutes.

## Disclaimer

It is the responsibility of the customer to check the suitability of the converted product (e.g. printed, glued etc.) for the intended application and its compliance with the relevant legislation and applicable requirements including all relevant restrictions therein.

The information provided in this declaration is based on the declarations provided by our chemical suppliers and/or on the material analyses results obtained at internal or external laboratories. The information provided herein is accurate to our current knowledge.

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This declaration is prepared and assured by Ieva Brink, Product Safety Manager at Iggesund Paperboard. It is valid for 2 (two) years or until either the customer requirements or the legislation have been significantly changed.



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