Declaration of Compliance

Version: 2019:2

Lunchbox LDPE

Trade name	Lunchbox LDPE(hereafter referred to as the extrusion coated paperboard)
Product description	Food service board with PE barrier on one side.
Baseboard grammage	For information see technical specification
Coating layer	Coating weights vary depending on specifications, this DoC covers all layer grammages mentioned in the specification. For more information see technical specification.
Fiber source	Fresh and virgin fiber
Bleaching	All used pulps are elemental chlorine free (ECF-pulps)
Production site	Lunchbox LDPE is manufactured at Stora Enso Consumer Board, Skoghall Mill and extrusion coated at Stora Enso Consumer Board, Skoghall Mill Forshaga
Producer	Stora Enso Skoghall Mill AB

Compliance with European food contact legislation

For the purpose to achieve high chemical and microbiological purity only fresh and virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

We hereby declare that this extrusion coated paperboard before converting complies where applicable and under foreseeable conditions of use with the requirements of **Regulation (EC) No 1935/2004** on materials and articles intended to come into contact with food. This extrusion coated paperboard is produced in accordance with **Commission Regulation (EC) No 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food.

This extrusion coated paperboard is intended for packaging dry, aqueous, acidic, low alcoholic and fatty foodstuffs.

This extrusion coated paperboard is intended for use under the following conditions of temperature and time.

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

This extrusion coated paperboard is not intended for use under the following conditions and temperatures.

- De-freezing and/or re-heating of food (e.g. ready meals) in microwave oven
- Conventional oven

* *It is the responsibility of the packer of the finished packages to ensure that the package is safe to use in the intended conditions. "Hot-fill" means the filling of any article with a food with a temperature not exceeding 100 °C at the moment of filling, after which the food cools down to 50 °C or below within 60 minutes, or to 30 °C or below within 150 minutes.*

Please also see storage conditions.

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Legal information
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Business ID: 556298-2545
VAT No: SE556298254501

NOTE!
For questions regarding if a specific end-use (food type and/or conditions) is covered by this declaration please contact your local sales office for more information. Please note that safe and appropriate use in this context means product safety. There might be technical limitations that the converter needs to take into account and test separately before use.

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

Paperboard

For the purpose to achieve high chemical and microbiological purity only virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms to established technology involving the use of generally recognized chemicals.

The **paperboard** 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
- Commission 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 (2017)

Information is based on the written confirmation of our suppliers and analysis performed on representative paperboard samples.

Plastic layer

All **the** raw **materials used in the extrusion coating** comply with the relevant requirements and under foreseeable conditions of use with
- 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
- Commission Regulation (EU) 10/2011 as amended by 2019/37 on plastic materials and articles intended to come into contact with food.

Information is based on the written confirmation of our suppliers of raw materials for the plastic layer and analysis performed on the extrusion coated paperboard.

SML's – plastic layer
Substances used in the board extrusion coating do not contain any monomers or additives with specific migration limit (SML) according to Commission Regulation (EU) **10/2011**.

Dual Use Additives– plastic layer
The used substances in the extrusion coating do not contain any additives that are authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008.

Analyses / Migration tests according to Commission Regulation (EU) 10/2011*

The overall migration tests have been performed on representative samples of **the plastic layer** of multi-material multi-layer structure according to EN 1186 with the following results. The contact area to volume ratio in the migration tests was 44,4 ml/dm². The overall migration limit 10 mg/dm² stipulated in the Commission Regulation (EU) **10/2011*** is not exceeded.

Simulant	Contact time	Temperature (°C)	Results (mg/ dm²)
3% Acetic acid	10 days	40	<10
10% Ethanol	10 days	40	<10
95% Ethanol	10 days	40	<10
Iso-Octane	2 days	20	<10

* *According to Article 14 of the Commission Regulation (EU)* ***10/2011:*** In a multi-material multi-layer material or article, the composition of each plastic layer shall comply with this Regulation. Overall migration limits and specific migration limits of this Regulation do not apply to plastic layers in multi-material multi-layer materials and articles. In a multi-material multi-layer material or article, specific and overall migration limits for plastic layers and for the final material or article may be established by national law.

Food Contact Guideline

The *Food Contact Guideline* previously known as *Industry Guideline, for the Compliance of Paper and Board Materials and Articles* for food contact provides harmonised approach for self-regulation of paper and board. Stora Enso as a company supports and operates according to the Food Contact Guideline. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site;
http://www.cepi.org/mediacentre/publications

Compliance with US food contact legislation

FDA Status of extrusion coated paperboard
Lunchbox LDPE product is a paperboard with oxygen barrier. Based on the FDA compliance information available for each layer, Stora Enso has determined that the plastic coated paperboard complies with the Federal Food, Drug and Cosmetic Act and applicable food additive regulations for use in contact with the food types I, II, III, IV-A, IV-B, V, VI-B, VII-A, VII-B, VIII and IX and under conditions of use C-G as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this board is not compliant as food packaging material used in contact with infant formula or human milk

NOTE!
Please note that safe and appropriate use in this context means product safety. There might be technical limitations that the converter needs to take into account and test separately before use. When converting this paperboard each part of the converting chain is responsible for the suitability for the intended end-use.

Analyses/Paperboard

Please note that the following information is applicable only for the paperboard layer in this multi-material multi-layer structure.

Compliance with BfR Recommendation XXXVI

The paperboard complies with the requirements in BfR Recommendation XXXVI as follows. Analyses have been performed on representative samples of paperboard.

Heavy metals:
Cadmium (Cd) < 5 µg/l in the cold water extract of the paperboard
Lead (Pb) < 10 µg/l in the cold water extract of the paperboard

Chloropropanols
1,3-DCP (1,2-dichloro-2-propanol) < 2 µg/l in hot and cold water extract of the paperboard
3-MCPD (3-monochloropropane diol) < 12 µg/l in the hot and cold water extract of the paperboard

Formaldehyde:
Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1 mg/dm^2.

Optical brightening agents:
Optical brightening agents, OBAs, are not used as raw material or intentionally added in the production of paperboard

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

Hemmhof test:
Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents.
We do not add surface biocides on top of the paperboard.

Other heavy metals

Chromium VI < 0,25 mg/kg as required in French DGCCRF
Mercury (Hg) < 0,3 mg/kg as required in French DGCCRF

Dioxins

The content of 17 2,3,7,8-substituted toxic congeners of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) and 12 dioxin like PCB's analysed in representative samples is less than 1 ppt WHO-TEQ.

PCB

Analyses have been performed on representative paperboard samples for polychlorinated biphenyls (PCB) according to EN ISO 15318. The amount of PCB is below < 2.0 mg/kg as required in French DGCCRF.

PCP

Analysis has been performed on representative paperboard sample for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP is < 0.1 mg/kg as required in French DGCCRF.

Substances/Extrusion coated paperboard

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 paperboard for the substances listed below. Information below is based on information given by our chemical suppliers.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the production paperboard. 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."*

Animal origin

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

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

Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II, the following food allergens or products derived thereof are not intentionally added for the manufacture of paperboard:

- 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 SO_2.
- Lupin and products thereof
- Molluscs and products thereof

**Please notice the exceptions in Commission Directive 1169/2011/EC, Annex II*

Phthalates

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

Bisphenol A

We hereby confirm that no bisphenol A is intentionally added in the production of paperboard.

Titanium dioxide

We hereby confirm that no Titanium dioxide is intentionally added in the production of paperboard.

Additional legislation and regulations, not food related

Packaging and Packaging Waste Directive

The **paperboard** complies with the Packaging and Packaging Waste directive 94/62/EC as amended.

- The sum of lead, cadmium, mercury and hexavalent chromium in the paperboard is less than 100 ppm (EN 13428).
- The level of substances hazardous* to the environment in the paperboard is less than 0,1% (EN 13428).

** Requirements for classification of substances or preparations dangerous to the environment and assigned the hazard statements H400, H410 and H411 according to the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).*

The paperboard is suitable for recovery by ;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)

Note: A material being recoverable by a certain method does not guarantee that the finished packaging can be recovered using this method.

REACH Regulation (EC) 1907/2006

We continuously monitor the development of the Candidate List of Substances of Very High Concern, the substances for authorization as well as any restrictions applicable to our use. To our knowledge and based on the information from our suppliers today we can confirm that none of our articles contains substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorisation) in a concentration above 0.1% (w/w).

Certified management systems at the production site/sites

Certificates are available on the internet: https://www.storaenso.com/en/download-centre?d=1&t=1

Paperboard production	*Polymer coating*
ISO 9001	ISO 9001
ISO 14001	ISO 14001
ISO 22000	ISO 22000
FSSC 22000	FSSC 22000
OHSAS 18001	OHSAS 18001
ISO 50001	FDA/IMS Packaging Certification https://www.accessdata.fda.gov/scripts/ims/mkex/ims/ims-fr.cfm
FSC® CoC	
PEFC CoC	

FSC® trademark license code: FSC®-C105192 PEFC™ logo license registration number: PEFC/02-31-71

Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 50-55 % relative humidity and 20-23° C. We recommend converting of the paperboard within 12 months from manufacturing date and after this time rights of claims normally disappear.

For more information regarding the shelf life of the board please contact your local sales office.

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 Stora Enso group.*

- *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 (d) 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*

Skoghall Aug 29, 2019

Stora Enso Consumer Board
Skoghall Mill

Annki Karlsson
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