

Declaration of Compliance

Version: 2022:1

CKB™ PE & CKB™ 2PE

<i>Trade name</i>	CKB™ PE and CKB™ 2PE (hereafter referred to as the product)
<i>Product description</i>	Multilayer kraft back board with PE barrier.
<i>Paperboard grammage</i>	Ranges between 195 g/m ² to 415 g/m ²
<i>Coating layer</i>	The PE barrier is on one side or on both sides of the paperboard. Barrier coating weights vary depending on specifications, this DoC covers all layer grammages mentioned in the specification. For more information see technical specification.
<i>Fiber source</i>	Fresh and virgin fiber
<i>Bleaching</i>	All used pulps are elemental chlorine free (ECF-pulps)
<i>Production site</i>	CKB™ PE and CKB™ 2PE are manufactured at Stora Enso Division Packaging Materials, Skoghall Mill and extrusion coated at Stora Enso Enso Division Packaging Materials Forshaga
<i>Producer</i>	Stora Enso AB

Please note that safe and appropriate use in this context means food safety. There might be technical limitations that any downstream operator in the food value chain needs to take into account and test separately before use. E.g. product might need additional barrier layer when used in contact with liquids.

Any downstream operator in the food value chain is responsible for the suitability and food safety at the intended end-use.

For questions regarding if a specific end-use (food type and/or conditions) is not covered by this declaration please contact the local Stora Enso sales office for more information.

Compliance with European food contact legislation

Information given in this declaration is based on our current knowledge and written confirmation from our chemical suppliers as well as analysis performed on representative product samples.

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 manufacturing of product. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

We hereby declare that this extrusion coated product 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 product is intended for packaging food and may stand in direct contact with dry, moist, acidic, alcoholic and fatty foodstuffs.

This product 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 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

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* *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.

The **product** 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 (2021)
- Commission Regulation (EU) 10/2011 as amended by 2020/1245 on plastic materials and articles intended to come into contact with food

SML's – Barrier layer

Substances subject to restrictions in Annex I

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** Annex I, Table 1.

Substances subject to restrictions in Annex II

Substances used in the board extrusion coating do not contain any substances listed in Annex II based on the information from our suppliers.

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

The overall migration tests have been performed on representative samples of **the barrier 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 50 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/ dm ²)
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 Guidelines

The *Food Contact Guidelines 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;

https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines_2019.pdf

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Analyses/Paperboard

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.

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
Aluminium (Al) ≤ 1 mg/kg food in the **extrusion coated paperboard**.

Chloropropanols

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

Formaldehyde:

Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1.0 mg/dm².

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 under conditions A. There was no visible transfer (grade 5) for any of the test fluids.

Transfer of antimicrobial constituents (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.

Biocides are analysed on representative samples and results are below the limitations set in BfR recommendations

Other heavy metals

Chromium VI < 0,25 mg/kg
Mercury (Hg) < 0,3 mg/kg

Nickel < 2.0 mg/dm² as required in Finnish KTM decree 268/1992
Chromium < 2.0 mg/dm² as required in Finnish KTM decree 268/1992
Lead < 0.50 mg/dm² as required in Finnish KTM decree 268/1992
Cadmium < 0.10 mg/dm² as required in Finnish KTM decree 268/1992

Compliance with US food contact legislation, FDA

FDA Status of extrusion coated paperboard

Information given in this declaration is based on our current knowledge and written confirmation from our chemical suppliers as well as analysis performed on representative paperboard samples.

Based on the FDA compliance information available for each layer, Stora Enso has determined that the polymer coated paperboard complies with the Federal Food, Drug and Cosmetic Act and applicable food additive regulations for use in contact with all food types and under conditions of use C-H as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this paperboard is not compliant as food packaging material used in contact with infant* formula or human milk without a functional barrier.

* The term "infant" refers to individuals aged 0- 6 months and "Infant food" is limited to infant formula and human milk. For more information please check with FDA Guidance on "Preparation of Food Contact Notifications for Food Contact Substances in Contact with Infant Formula and/or Human Milk". <https://www.fda.gov/media/124714/download>

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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.

Animal origin

We hereby confirm that no additive of animal origin is intentionally added during the manufacturing process of the product. We hereby confirm that substances causing Transmissible Spongiform Encephalopathies (TSEs), including Bovine Spongiform Encephalopathy (BSE) and Creutzfeldt Jacob Disease (CJD), are not intentionally added in the manufacturing of the product.

Based on our current knowledge, this product could qualify with vegan certification criteria.

CMR substances

Based on information from our suppliers of chemical additives, substances classified as “carcinogenic”, “mutagenic” or “toxic for reproduction” in Regulation (EC) 1272/2008 as amended, in concentrations over the legislative limits stated in the material data sheets for our chemical products, are not intentionally added during the manufacturing process of the product.

Dual Use Additives

The following additives are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 and according to information from our chemical supplier may be present in the product:

Dual Use substance	CAS number	E number
calcium carbonate	471-34-1	E170
sodium sulfite	7757-83-7	E221
sodium bisulfite	7631-90-5	E222
sodium metabisulphite	7681-57-4	E223
formic acid	64-18-6	E236
sodium formate	141-53-7	E237
formaldehyde	50-00-0	E240
sodium nitrate	7631-99-4	E251
potassium acetate	127-08-2	E261
citric acid	77-92-9	E330
disodium phosphate	7558-79-4	E339
adipic acid	124-04-9	E355
xanthan gum	11138-66-2	E415
glycerol	56-81-5	E422
sodium carboxymethylcellulose	9004-32-4	E466
sorbitan monolaurate	1338-39-2	E493
magnesium chloride	7786-30-3	E511
sulfuric acid	7664-93-9	E513
sodium sulphate	7757-82-6	E514
aluminum sulfate	10043-01-3	E520
sodium hydroxide	1310-73-2	E524
silicon dioxide	112926-00-8	E551
stearic acid	57-11-4	E570
starch sodium octenyl succinate	52906-93-1	E1450
propane-1,2-diol	57-55-6	E1520
polyethylene glycol	25322-68-3	E1521
glutaraldehyde	111-30-8	FL. no. 05-149

EN 71-3 Safety of toys – Part 3: Migration of certain elements

We hereby confirm that product, before further converting, comply with the requirements of EN 71-3:2019 + A1:2021 Safety of toys – Part 3: Migration of certain elements.

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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 during the manufacturing process of the product:

- 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

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

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**.

*Genetically Modified Organisms (europa.eu)

** 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."

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>

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 the local Stora Enso sales office.



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Skoghall, March 15, 2022

Stora Enso Division Packaging Materials
Skoghall Mill

Annki Karlsson
Product Safety Specialist

Disclaimer

It is the responsibility of the manufacturer of the final product/package to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application and end use. This information 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 information is only valid at the date of this letter and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.*
- *This information is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- *Nothing in this information 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 information 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 information.*
- *No one other than the addressee may rely on this information and we assume no liability whatsoever to any third party.*
- *Any reference in this document to words "we" or "us" shall mean Stora Enso Oyj and/or its affiliate(s), as applicable from time to time.*