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Declaration of Compliance

Product Name: Algro Design

Product Description: Solid bleached cartonboard

1. General Information

Pulp composition

The above mentioned product is produced with a mixture of elementary and totally chlorine free bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that the above mentioned product is produced without intentional addition of any recycled materials.

Acid content/Chloride content

The pH of *Algro Design* measured according to ISO 6588-1:2012-11 is between 8-10. Therefore, *Algro Design* can be described as alkaline. It has not been tested for chloride content.

Storing and handling recommendations

Under appropriate storage conditions the functionality of *Algro Design* is guaranteed for 12 months after supply. Appropriate storage conditions are defined as storage of the supplied reels and sheets in original packaging protected against direct sun light at an average climate ($\pm 10\%$) of 23°C, 50 % rel. humidity. Especially high storage temperatures, high ambient humidity and direct UV radiation should be avoided. In case of differences between storage climate and the ambient conditions during conversion the reels and sheets must be stored at least 24 h in original packaging, preferably 48 h near the conversion machine to make sure that the reels and sheets adopt the ambient temperature. This also holds for paper reels just supplied because temperature differences over the web width and running length might negatively affect the conversion process. To avoid the buildup of rope marks and creases, as well as flatness deviations (in case of sheets) by moisture exchange with the environment, the original packaging, especially under humid climate conditions, should only be removed immediately before conversion. Also opened reels have to be appropriately repacked with a moisture barrier packaging.

2. Food Contact Status

Conditions for food contact

Algro Design can be used as food contact material. It can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry foodstuff. Furthermore, contact can be made with such fatty foodstuffs which were assigned to a correction factor of at least 3 according to Annex II, table 2 of Commission Regulation EU 10/2011.

Compliance with (EU) No 1935/2004

Algro Design complies with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. *Algro Design* can be applied as packaging for foodstuffs.

Compliance with (EC) No 2023/2006

Algro Design was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. The producing mill has implemented a quality management system according

to ISO 9001 as well as a hygiene management system. Both are externally certified.

Compliance with BfR recommendation XXXVI

Algro Design is approved according to BfR recommendation XXXVI in its current version (1.2.2023).

Compliance with Foodstuffs and Animal Feed Code (LFGB)

Algro Design is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

Compliance with Italian legislation DM 21.3.73

Algro Design has not been assessed for compliance with Ministerial Decree of 21 March 1973.

Compliance with (EU) No 10/2011

Algro Design is not within the scope *Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food*, as it is not plastic. *Algro Design* might contain substances subject to a SML according to this regulation. Based on the information given by our raw material suppliers, worst-case calculations are performed to determine the content of respective SML substances in *Algro Design*. Based on this calculated content, the SML limits for each substance (or substance group) migrating in the foodstuff are kept, if a food contact material/food ratio of 13 dm²/kg is considered.

Amendments up to and until 10 August 2023 (Commission Regulation (EU) 2023/1627) have been considered.

Compliance with FDA requirements for food packaging

Algro Design is in compliance with the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (current version of March 2023), §§ 176.170 and 176.180.

Compliance with Chinese food contact legislation

Algro Design has not been assessed for compliance with GB 9685-2016 or any other Chinese legislation.

Compliance with the Swiss Ordinance on food packaging materials

Algro Design fulfills the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

Compliance with the Canadian Food and Drugs Act

Algro Design has not been assessed according to Division 23 of the Food and Drugs Act and Regulations, Section B.23.001 or any other Canadian legislation.

Information on migration tests

No migration tests have been performed with *Algro Design*.

CEPI Food Contact Guideline

Algro Design is compliant with the requirements of the CEPI Food Contact Guidelines for The Compliance of Paper & Board Materials and Articles. The latest version from 2019 has been considered in the assessment.

3. Toy Safety

EU toy safety directive

Algro Design has not been assessed against the requirements of Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys.

Toy safety EN 71/3

Algro Design has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3:2019+A1:2021: "Migration of certain elements".

Toy safety EN 71/9

Algro Design has not been tested according to Toy Safety standard EN 71 part 9:2005.

4. Relevant legislation

Compliance with EC 1907/2006 (REACH)

EC 1907/2006 (REACH) primarily addresses chemical substances and preparations. From the perspective of REACH paper is considered as an article. Registration or notification requirements only apply for articles if the certain criteria are met. This is not the case for above mentioned product, that is why registration or notification requirements under REACH cannot be applied. None of the substances listed in the ECHA Candidate List of Substances of Very High Concern, updated on June 14th 2023, are intentionally used in the formulation or during the manufacturing process of above mentioned product in a content > 0,1%. We further confirm the compliance with Article 33 of EC 1907/2006 about the duty to communicate information on substances in articles.

Compliance with 94/62/EC (Packaging)

Algro Design is in compliance with the Directive 94/62/EC on packaging and packaging waste, including latest amendments, regarding the content of heavy metals as specified in Article 11. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

CONEG

Algro Design is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

EN 13427

In case *Algro Design* is used as part of a packaging material, the following statements regarding the EN 13427 et seqq. may serve as the input for the producer of the finished packaging.

- EN 13427: This standard specifies requirements and a procedure by which a person or organisation responsible for placing packaging or packed product on the market may combine the application of the following packaging standards.
- EN 13428: *Algro Design* is made without the use of waste paper. The usage of hazardous chemicals during production has been minimized. The sum of content of the heavy metals lead (Pb), cadmium (Cd), mercury (Hg) and chromium VI (CrVI) in *Algro Design* is below 100 ppm.
- EN 13429: This is not directly applicable to *Algro Design* and depends on the properties of the finished packaging.
- EN 13430: *Algro Design* is fully recyclable and comply with the criteria of this standard regarding material recycling. We advise and encourage all users of our papers to recycle our papers after use.
- EN 13431: *Algro Design* will contribute a positive calorific value for a thermal energy recovery process. We however recommend favouring material recycling over incineration.
- EN 13432: *Algro Design* has not been tested on the requirements of this clause. We recommend favouring material recycling over composting.

Compliance with (EU) 528/2012 (Biocides)

The preservation agents used in the production of *Algro Design* (e.g. in pigment slurries) comply with the Regulation (EU) 528/2012, including amendments and are used in accordance with XXXVI. recommendation of the BfR. No special biocide treatment is applied to the above mentioned product to give it an antimicrobial effect, it is therefore not a 'treated article' in sense of the Regulation (EU) 528/2012. *Algro Design* does not have an effect on the growth of microorganisms which is proven by a negative Hemmhof test based on DIN EN 1104.

Compliance with (EC) No 1223/2009 (Cosmetics)

During the production of this grade, none of the substances listed in Annex II of Regulation EG 1223/2009 is intentionally added. With respect to Annex III, the following substances might be intentionally added during production:

- Sodium hydroxide (Entry 15a, CAS 1310-73-2)
- Talc (Entry 59, CAS 14807-96-6)
- Polyacrylamide (Entry 66)

Compliance with Directive 2011/65/EU (RoHS)

The EU-directive 2011/65/EC on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 are not applicable to *Algro Design*.

Compliance with 2002/96/EC (WEEE)

The Directive 2002/96/EC on waste electrical and electronic equipment (WEEE) is not applicable to *Algro Design*. We confirm, that none of the substances listed in Annex II of this directive are not intentionally added during production.

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of the above mentioned product. Updates until and including November 17th, 2023 have been considered.

Canadian Environmental Protection Act

Substances listed in Canadian Environmental Protection Act, 1999 are not intentionally added to the manufacturing process of *Algro Design*.

EU Ecolabel

The above mentioned product has not been awarded an EU Ecolabel.

5. Miscellaneous

Automotive industry restricted substances

The material has not been assessed against the GADSL list.

Animal testing

The production facilities for *Algro Design* does neither conduct nor commission animal testing with *Algro Design*. Our suppliers confirmed that they neither conduct nor commission animal testing with their products at all or commission animal testing only as a part of a toxicological evaluation to ensure safety and regulatory compliance of the respective products. The suppliers who are concerned confirmed that they are continuously looking for in-vitro alternatives being accepted by legal authorities in order to actively minimize testing on animals.

BSE/TSE risk

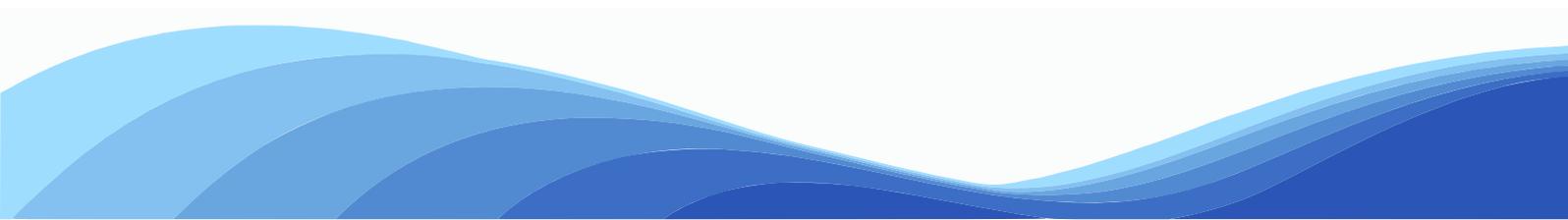
Raw materials of animal origin classified as risk materials according to COMMISSION REGULATION (EC) No 1326/2001, Annex III, are not used during the manufacture of *Algro Design*. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex I 3. of EU 722/2012 are applied.

Halal/Kosher

The presence of traces of substances of animal origin in *Algro Design* cannot be fully excluded. Neither *Algro Design* nor the producing mills have been assessed or certified as Kosher or Halal.

Substances of animal origin

The presence of traces of substances of animal origin in *Algro Design* cannot be fully excluded.



6. Information on end-of-life scenarios

Recyclability

The above mentioned product is fully recyclable in the waste paper stream. *Algro Design* has not been tested for its repulpability properties, but to the best of our knowledge about *Algro Design* composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 21 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

Biodegradability

The above mentioned product has not been tested on biodegradability or compostability. Based on knowledge on product composition and raw materials, we do not see significant restrictions in its biodegradability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes. Due to its alkali properties the paper would even improve compost as it buffers soil acidification, a common challenge in agriculture. Our papers do contain fossil polymer binders. Information on product composition is available on Paper Profiles. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

7. Non-use of specific substances or materials

Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of *Algro Design*.

MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

Metals

The non-presence of heavy metals is regularly monitored by analytical tests and can be confirmed according to the following:

- Cadmium (Cd) (CAS: 7440-43-9) <0.5 mg/kg
- Lead (Pb) (CAS: 7439-92-1) <5 mg/kg
- Mercury (Hg) (CAS: 7439-97-6) <0.25 mg/kg
- Chromium VI (Cr6+) (CAS: 18540-29-9) <1 mg/kg
- Sum of Pb, Cd, Hg and Cr(IV) <100 mg/kg.

Radioactive substances/Radiation

During the production of above mentioned paper grade no radioactive substances are intentionally added. X-Ray measuring devices are installed in our paper machines in order to measure parameters like ash content and coating weight online. The ionizing effect of these measurements on the paper web can be considered to be negligible.

Anthraquinone

Anthraquinone (CAS 84-65-1) has not been added to the manufacturing process of the above mentioned product. Its nonpresence in the raw materials is screened regularly.

Nanomaterials

Raw materials, such as calcium carbonate, containing particles with one or more external dimensions in the nano range may be used in the manufacturing process of the above mentioned product. These particles would meet the definition of nanoparticles according to Commission Recommendation of 10 June 2022. The presence of these particles in the respective raw materials arises from a naturally occurring and/or technically unavoidable particle number-based size distribution. These particles are embedded in the paper matrix and are not anticipated to undergo migration.

Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of *Algro Design*, except for wheat starch, which may be added and in turn contains gluten. *Algro Design* therefore may contain less than 20 ppm gluten. According to the standard CXS 118-1979, dietary foods with less than 20 mg/kg are considered gluten-free foods. Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

Glycides

Algro Design has not been tested for the presence of glycidyl fatty acid esters as well as glycidyl silanes, such as GLYMO or GLyEO. We do not intentionally add these chemicals to the manufacturing process and they are not expected to be present in the final product.

PFAS

Per- and polyfluoroalkyl substances (PFAS), defined as substances that contain at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom (without any H/Cl/Br/I atom attached to it), have not been intentionally added to the manufacturing process of *Algro Design*. These substances are not part of *Algro Design* formulation and they are not expected to be present in the product. *Algro Design* meets the demands of Danish Order No. 681 of 25th May 2020, chapter 3, §8.

Polystyrene

Solid polystyrene plastics are not used in the manufacturing process of *Algro Design*. In paper raw materials, water dispersions of styrene-butadiene latex can be used.

Persistent organic pollutants

None of the following substances listed in Annexes A,B, and C of the Stockholm Convention have been intentionally added during production of this product:

- Aldrin
- Chlordane
- Dieldrin
- DDT
- Endrin
- Heptachlor
- Hexachlorobenzene
- Mirex
- Toxaphene
- Polychlorinated biphenyls (PCBs) and terphenyls (PCTs)
- Dioxins and furans

None of the following substances listed in the amendments of Stockholm Convention Annexes A, B, and C in the COP decisions SC4/10-4/18, SC 5/3, SC 6/13 have been intentionally added during production of *Algro Design*:

- Chlordecone
- Alpha and beta hexachlorocyclohexane
- Lindane
- Hexabromobiphenyl, hexabromodiphenyl ether andheptabromodiphenyl ether
- Pentachlorobenzene
- Perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride
- Tetrabromodiphenyl and pentabromodiphenyl ethers

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of *Algro Design*. The amendments up to and including 30 May 2023 (EU 2023/1608) have been considered.

Ozone depleting substances

Substances listed in Montreal Protocol 1987 and in European regulation 2037/2000/EC are not intentionally added during the production of *Algro Design*.

Titanium oxides

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of *Algro Design* formulation and they are not expected to be present in *Algro Design*.

Intelligent and active materials

Algro Design does not contain intelligent or active materials as defined in the European framework regulation for the food contact materials EU 1935/2005.

Optical brightening agents

Optical brightening agents (OBAs) are intentionally used during the manufacture of *Algro Design*. These substances are used in accordance with respective BfR recommendations and FDA legislation.

PVDC

Polyvinylidene chloride (PVDC) is not added to the manufacturing process of the above mentioned product.

Sulfur

As far as it concerns content of sulfur species, the above mentioned product is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered 'reducible sulfur species' according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of 'Reducible sulfur species' according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

Conflict minerals

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of *Algro Design*.

CMR Substances according to CLP legislation

During the production of *Algro Design*, no substances classified as carcinogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

Corn and corn by-products

During the production of above mentioned product, corn products (e.g. starch) are added.

Residual solvents

Based on our knowledge on the manufacturing process and the raw materials used in the above mentioned product, we expect no residual solvents to be present in the final product.

Dyes

Nuance dyes are intentionally added during the production of *Algro Design*. They are used in compliance with XXXVI recommendation of the BfR and FDA regulations.

Flame retardants

No flame retardants have been added to the manufacturing process of *Algro Design*. We can confirm non-use of the following substances commonly used as flame retardants:

- Antimony trioxide CAS (1309-64-4)
- TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
- TBB, 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
- Chlorinated paraffins CAS (108171-26-2)
- TCPP, Tris(1-chloro-2-propyl) phosphate CAS (13674-84-5)
- HBCD, Hexabromocyclododecane CAS (3194-55-6)

- TBBPA, Tetrabromobisphenol A CAS (79-94-7)
- TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
- TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
- Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
- Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
- Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

TSCA Section 6

No substances listed under Section 6 of the US Toxic Substances Control Act have been intentionally added to the manufacturing process of *Algro Design* and they are not expected to be present. At the time of the assessment the following persistent, bioaccumulative, and toxic chemical substances have been listed:

- PIP (3:1) - phenol, isopropylated phosphate (3:1) (CAS 68937-41-7)
- DecaBDE - decabromodiphenyl ether (CAS 1163-19-5)
- HCBd - hexachlorobutadiene (CAS 87-68-3)
- PCTP - pentachlorothiophenol (CAS 133-49-3)
- TTBP - 2,4,6-tris(tert-butyl)phenol (CAS 732-26-3)

Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of *Algro Design*:

- Alkylphenols and their ethoxylates
- Anthraquinone (CAS 84-65-1)
- Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
- Asbestos
- Azodicarbonamide (CAS 123-77-3)
- BAC (CAS 63449-41-2)
- BADGE, BFDGE, NOGE
- Benzene (CAS 71-43-2)
- Benzophenones
- Bisphenols
- Cadmium, lead, mercury, chromium and compounds thereof
- Chlorine and other halogens (Fluorine, Bromine, Iodine)
- Cobalt and its compounds
- Creosote
- Cyanuric acid (CAS 108-80-5)
- DDAC (CAS 7173-51-5)
- Diisopropylnaphtalenes (DIPNs)
- Dimethylfumarate (CAS 624-49-7)
- Dioxane (CAS 123-91-1)
- Disodium guanylate (CAS 5550-12-9)
- Epoxy resins
- Ethanol (CAS 64-17-5)
- Ethylene oxide (75-21-8)
- Formaldehyde
- Glyphosate (CAS 107-83-6)
- Glycol ethers
- GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
- Hexane (CAS 110-54-3)
- Inosinate (CAS 4691-65-0)
- Isobornyl Acrylate (CAS 5888-33-5)
- Isopropyl alcohol (IPA) (CAS 67-63-0)
- Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
- Melamine (CAS 108-78-1)
- Micas

- Monosodium glutamate (CAS 142-47-2)
- Natural rubber latex materials
- N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
- Nitrosamines, Nitrites, Nitrates
- Nitrocellulose
- N-Methylpyrrolidone (NMP) (CAS 872-50-4)
- 4-Nonylphenol (4-NP) (CAS 3050-88-2)
- Nonylphenoethoxylate (NPE, CAS 127087-87-0)
- Organic Peroxides
- Organotin compounds
- Orthophenylphenol (CAS 90-43-7)
- Partially hydrogenated terphenyls (HTPs)
- Pentachlorophenol (PCP)
- Pentanedione-2,4-titanium
- Perchlorates
- Pesticides and Fungicides
- Phenylalanin
- Phthalates
- Polycyclic aromatic hydrocarbons (PAHs)
- Polyvinylchloride (PVC)
- Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
- Radioactive materials, radioactive contamination
- Rayon
- Resorcinol (CAS No. 108-46-3)
- Rice plant derived substances
- Seed-bearing parts of a flowering plant (fruits)
- Sodium Antimonate A (CAS 15432-85-6)
- TAA Titanium Acetylacetonate (CAS 17501-79-0)
- Toluene (CAS 108-88-3)
- Triclosan (CAS 3380-34-5)
- Tris(4-nonylphenyl, branched and linear) phosphite
- 2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
- Vinyl chloride (CAS 75-01-4)
- Volatile Organic Compounds
- Yeast
- TNPP, 4 NP and NPE

8. Disclaimer

Disclaimer

This declaration is restricted to the above mentioned product in the state it is delivered by us. This information provided in this statement applies only for the above mentioned product and may not substitute necessary end use testing. Sappi shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of *Algro Design* for a particular application or end use. The information given in this statement has been verified by Sappi at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available. Republishing this document is not permitted.