

## CERTIFICATE OF COMPLIANCE

### GERMAN RECOMMENDATION BfR XXXVI AND REGULATION (EC) 1935/2004 FOR LINER KRAFT

#### REGARDING CONTACT WITH FOODSTUFFS

Over the last years, the basic legislation that has been leading at the European level for materials and articles intended to come into contact with food is Regulation 1935/2004/EC. This Regulation has made provision for the adoption of specific directives or measures relating to particular groups of materials or articles. However so far, no specific measure has been introduced for paper and board at the level of the European Union.

Paper and board for food contact is different from plastics, where most legislative provisions have so far been concentrated. For instance:

- It has low consumer exposure due to the low proportion of all direct contact food packaging, where the main application is contact with dry food.
- It has a completely different manufacturing process compared to plastics.
- Its predominant base polymer is cellulose.
- Standard migration test methods used for plastics are not easily applicable or not appropriate for paper.

For these reasons, regulation and control of paper and board for food contact using the “plastics” approach with control of numerous specific migration limits does not appear to be the most suitable. The already existing and widely used German Recommendation BfR XXXVI (Bundesinstitut für Risikobewertung) sets compositional limits and seems to be a more appropriate basis for regulation and control.

Thus, as per the information available on tests done in independent testing laboratories, our Kraft liners in all its substances comply with the Recommendation BfR XXXVI and at the same time to Regulation 1935/2004/EC, being considered as suitable for contact with foodstuff.

**Marketing Department**  
**Self-Adhesive Division**

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*This certificate of conformity is based on information provided by suppliers and tests done in external laboratories that we consider to be reliable, but in any case it constitutes any warranty. Responsibilities in the appropriate use of the product relays on the final user.*