

Dr. Ralph Derra

Öffentlich bestellter und vereidigter Sachverständiger für
Verpackungsmaterialien, Boden- und Luftanalysen;
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14 October 2025

Dr. Dr/Ils-kr

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

65713 U 25

für
for
pour

Arctic Paper Kostrzyn S. A.
ul. Fabryczna 1
66-470 Kostrzyn n/O.
Poland

Produkt
Product
Produit

Amber Graphic
Amber Preprint

The products manufactured by the company mentioned above are paper grades which are used for food packaging.

They were examined by us in consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact", current status, in connection with the BfR guideline "Testing of substance transfers from consumer articles made of paper, cardboard and paperboard", as of 28 September 2023),

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Additionally, analyses according to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of February 2025, category III,

as well as for organic chemical compounds applicable for paper according to the

DIN EN 71, part 10 "Safety of Toys, Organic chemical compounds – Sample preparation and extraction", state of March 2006,

and the

DIN EN 71, part 11 "Safety of Toys, Organic chemical compounds – Methods of analysis", state of January 2006,

were carried out.

Furthermore, the paper grades were tested for limited heavy metals according to the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5,

as well as to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

The paper grades are in compliance with the rules of the

Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, Official Journal of the European Union L 338/4 of 13.11.2004, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, article 3, 1. (a) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl. I. p. 4253; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and conform to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970, Stand vom 01.08.2024,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024).

Moreover, they meet the applicable provisions of the Swiss

SR 817.0 Bundesgesetz über Lebensmittel und Gebrauchsgegenstände (Lebensmittelgesetz – LMG) vom 20. Juni 2014 (AS 2017 249), Stand am 1. Oktober 2024 (AS 2024 457), Artikel 15,

(SR 817.0 Federal Act on Foodstuffs and Utility Articles (Foodstuffs Act, FSA) of 20 June 2014 (AS 2017 249), state of 1 October 2024 (AS 2024 457), article 15),

as well as of the

SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) vom 16. Dezember 2016 (AS 2017 283), Stand am 1. Juli 2025 (AS 2024 24), Artikel 49,

(SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (AS 2017 283), state of 1 July 2025 (AS 2024 24), article 49).

The requirements of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of February 2025, category III,

as well as of the

DIN EN 71, part 9 "Safety of Toys, Organic chemical compounds – Requirements", state of September 2007,

for the toy material "paper" are also observed by the paper grades.

With regard to the content of heavy metals, they also meet the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5,

as well as the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

Thus the paper grades **Amber Graphic** and **Amber Preprint** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty and such food which is peeled, shelled or washed before consumption.

This certificate of compliance has a validity of 2 years and consists of 5 pages.

Certification decision



Öffentlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Kunststoffen, Glas, Weißblech und
sonstigen Metallverpackungen auf ihre
lebensmittelrechtliche Unbedenklichkeit

(Höfert)
Officially certified
and authorized food
chemist

The translation of the above stamps is given on page 5.
La traduction des estampilles est donnée en page 5.



**Staatlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Kunststoffen, Glas, Weißblech und
sonstigen Metallverpackungen auf ihre
Lebensmittelrechtliche Unbedenklichkeit**

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce.

State registered expert for the analysis of contrasting samples of packaging materials of paper, board, plastics, glass, tin plate and other metallic packaging materials as to their suitability for use with foodstuffs.

Expert public pour l'étude du contrôle des contre-échantillons d'emballages de papier, cartons, plastiques, verre, fer-blanc et d'autres emballages métalliques concernant leur conformité alimentaire.



Dr. Ralph Derra

Authorized expert for the analyses of soil and air, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse du sol et de l'air, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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