

**Dr. Ralph Derra**

Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
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3 May 2024

Dr. Dr/Hf-ci

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

62005 U 24

für  
for  
pour

Suzano S.A.  
Av. Brigadeiro Faria Lima 1355  
01452-919 São Paulo  
Brazil

Produkt  
Product  
Produit

Mucuri 1 – ECF Bleached Eucalyptus Kraft Pulp  
Mucuri 2 – ECF Bleached Eucalyptus Kraft Pulp

The product manufactured by the company mentioned above are pulp grades which are used for the manufacture of papers and boards for food packaging as well as of cooking and hot filter papers..

They were examined by us under 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 26.02.2015,

(BfR-"Collection of methods for the examination of paper and board for food contact" of the, current state), in connection with the BfR guideline "Examination of the transfer of substances from consumer products made of paper and board", as of 26.02.2015),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2021 edition), § 176.170,

for the used raw materials and fabrication additives as well as for the release of substances which might endanger health.

Additionally, they were analysed in line with the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021,  
for the migration of certain elements.

The pulp 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 2 Absatz 6 des Gesetzes vom 20. Dezember 2022 (BGBl. I S. 2752), §§ 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 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023),

as well as to the

BfR-Empfehlung XXXVI/1. Koch- und Heißfilterpapiere und Filterschichten, neu gefasst durch 200. Mitteilung, Bundesgesundheitsblatt 42 (1999) 817, zuletzt geändert durch 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI/1. Cooking Papers, Hot Filter Papers and Filter Layers, recasted by 200<sup>th</sup> Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

Moreover, the pulp grades fulfil the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2022 edition), §§ 176.170 and 176.180.

Thus the pulp grades **Mucuri 1 – ECF Bleached Eucalyptus Kraft Pulp** and **Mucuri 2 – ECF Bleached Eucalyptus Kraft Pulp** according to the sample material submitted may be used safely for the manufacture of papers and boards for food packaging as well as of cooking and hot filter papers. The finished products manufactured with it may stand in direct contact with dry, moist and fatty foodstuffs as far as the pulp grades mentioned above are concerned.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



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

(Derra)  
Officially certified  
and authorized food  
chemist



**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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