

16 October 2024  
Dr. Dr/Hf-do

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

63170 U 24

für  
for  
pour

Suzano International Trade GmbH  
Jakov-Lind-Strasse 13/5 - 4.OG  
1020 Wien  
Austria

Produkt  
Product  
Produit

Imperatriz Bleached Eucalyptus Kraft Pulp

The product manufactured by the company mentioned above is a pulp grade which is used for the manufacture of papers and boards for food packaging, of cooking and hot filter papers, of baking papers and boards, of absorbent pads as well as of cigarette papers.

It was 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 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),

as well as according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2024 edition),  
§ 176.170,

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

Furthermore, the pulp grade was tested for limited heavy metals according to the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

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 pulp grade is 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 conforms 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 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227<sup>th</sup> Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024),

as well as to the

BfR-Empfehlung XXXVI/1. Koch- und Heißfilterpapiere und Filterschichten, neugefasst durch 200. Mitteilung, Bundesgesundheitsblatt 42 (1999) 817, zuletzt geändert durch 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970, Stand vom 01.08.2024,

(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 227<sup>th</sup> Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024),

and to the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970, Stand vom 01.08.2024,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181<sup>st</sup> Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 227<sup>th</sup> Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024),

as well as to the

BfR-Empfehlung XXXVI/3. Saugeinlagen auf Basis von Cellulosefasern für die Verpackung von Lebensmitteln, 205. Mitteilung, Bundesgesundheitsblatt 45 (2002) 936, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021, einschließlich 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970,

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

Furthermore, the pulp grade is in compliance with the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2024 edition), §§ 176.170 and 176.180.

With regard to the content of heavy metals, it also meets the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

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 pulp grade **Imperatriz 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 grade mentioned above is concerned.

Furthermore, the use of **Imperatriz Bleached Eucalyptus Kraft Pulp** for the fabrication of papers for tobacco products is approved. Papers manufactured with it are in compliance with the demands of the

Gesetz über Tabakerzeugnisse und verwandte Erzeugnisse (Tabakerzeugnisgesetz – TabakerzG) vom 4. April 2016 (BGBl. I S 569), zuletzt geändert durch Artikel 1 des Gesetzes vom 19. Juli 2023 (BGBl. 2023 I Nr. 194), § 5,

(Act on tobacco products and related products of 4 April 2016 (BGBl. I p. 569), last amended by article 1 of the act of 19 July 2023 (BGBl. 2023 I no.194), § 5),

as well as of the

Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse (Tabakerzeugnisverordnung – TabakerzV) vom 27. April 2016 (BGBl. I S. 980), zuletzt geändert durch Artikel 1 der Verordnung vom 24. Juli 2023 (BGBl. 2023 I Nr. 196), § 4,

(Ordinance on tobacco products and related products of 27 April 2016 (BGBl. I p. 980), last amended by article 1 of the ordinance of 24 July 2023 (BGBl. 2023 I no. 196), § 4),

and may be used as intended, as far as the pulp grade is concerned.

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

Certification decision



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

(Höfert)  
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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