

Dr. Ralph Derra

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Verpackungsmaterialien, Boden- und Luftanalysen;
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22 January 2025

Dr. Dr/Hf-do

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

63834 U 25

für
for
pour

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

Produkt
Product
Produit

Imperatriz Eucastromg SP3
Imperatriz Eucastromg SP1

The products manufactured by the company mentioned above are pulp grades which are 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.

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 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,

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 grades were 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 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),

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 200th Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 227th 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, 181st Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024),

as well as to the

BfR-Empfehlung XXXVI/3. Saugelagen 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 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227th Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024).

Furthermore, the pulp grades are 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, they also meet 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 grades **Imperatriz Eucastrom SP3** and **Imperatriz Eucastrom SP1** 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 one of the products may stand in direct contact with dry, moist and fatty foodstuffs as far as the pulp grades mentioned above are concerned.

Furthermore, the use of **Imperatriz Eucastromg SP3** and **Imperatriz Eucastromg SP1** for the fabrication of papers for tobacco products is approved. Papers manufactured with one of the products 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 grades are 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, Pappe,
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.

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

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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