

# Declaration of Compliance

Version: 2023:1

## Tamfold™

<i>Trade name</i>	<b>Tamfold</b> and <b>Tamfold HS</b> (hereafter referred to as the product)
<i>Product description</i>	Coated folding boxboard with cream uncoated reverse
<i>Grammage</i>	Ranges between 190 g/m <sup>2</sup> to 325 g/m <sup>2</sup> For more information see technical specification.
<i>Fiber source</i>	100% fresh fiber
<i>Bleaching</i>	All used pulps are elemental chlorine free (ECF-pulps)
<i>Production site</i>	Tamfold and Tamfold HS are manufactured at Stora Enso Division Packaging Materials, Ingerois Mill
<i>Producer</i>	Stora Enso Division Packaging Materials, Ingerois Mill

Please note that safe and appropriate use in this context means food safety. There might be technical limitations that any downstream operator in the food value chain needs to take into account and test separately before use.

Any downstream operator in the food value chain is responsible for the suitability and food safety at the intended end-use.

For questions regarding end-use (food type and/or conditions) please contact the local Stora Enso sales office for more information.

Information given in this declaration is based on our current knowledge and written confirmation from our raw material suppliers as well as analysis performed on representative samples based on worst case approach.

For the purpose to achieve high chemical and microbiological purity only fresh fibers and food contact approved chemical additives are used as raw material in the manufacturing of product. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognized chemicals.

## Compliance with European food contact legislation

We hereby declare that this product before conversion complies where applicable and under foreseeable conditions of use with the requirements of **Regulation (EC) No 1935/2004** on materials and articles intended to come into contact with food as well as **BfR Recommendation XXXVI** on paper and board for food contact (2023). This product is manufactured in accordance with **Commission Regulation (EC) No 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food.

The product is approved for direct food contact with dry, moist, acidic and fatty foodstuffs.

When packing moist, acidic and fatty foodstuffs we recommend a functional barrier between the food and the board for technical reasons although a direct contact is allowed.

This product is intended for use under the following conditions:

- Any long-term storage at room temperature or below (including freezer/fridge)
- Holding and reheating of food up to 90°C

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This product is not intended for use under the following conditions:

- Microwave oven above 90 °C
- Conventional oven above 90 °C

Please also see storage conditions.

## Food Contact Guidelines

The *Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles* for food contact provides harmonised approach for self-regulation of paper and board. Stora Enso as a company supports and operates according to the Food Contact Guidelines. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site;

[https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines\\_2019.pdf](https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines_2019.pdf)

## Analyses

### **Compliance with BfR Recommendation XXXVI**

The product complies with the requirements in BfR Recommendation XXXVI as follows. Analyses have been performed on representative samples of product.

*Heavy metals:*

Cadmium (Cd) < 5 µg/l in the cold water extract of the product  
Lead (Pb) < 10 µg/l in the cold water extract of the product

Aluminium (Al) ≤ 1 mg/l in the cold water extract of the product

*Formaldehyde:* Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1,0 mg/dm<sup>2</sup>.

*Optical brightening agents:* OBAs, as such, are not added as raw material in the production of paperboard. However, small amounts of OBA may be present in the board because OBA is used in the same board machine in other board grades. Analysis has been performed according to EN 648 under test conditions A. There was no visible transfer (grade 5) for any of the test fluids.

*Colour fastness:* Analysis has been performed according to EN 646 under test conditions A. There was no visible transfer (grade 5) for any of the test fluids.

*Transfer of antimicrobial constituents (Hemmhof test):* Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents. We do not add surface biocides on top of the product.

*Biocides* are analysed on representative samples and results are below the limitations set in BfR recommendations.

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## Other heavy metals

Chromium VI	< 0,25 mg/kg
Mercury (Hg)	< 0,3 mg/kg
Nickel	< 2,0 mg/dm <sup>2</sup>
Chromium	< 2,0 mg/dm <sup>2</sup>
Lead	< 0,50 mg/dm <sup>2</sup>
Cadmium	< 0,10 mg/dm <sup>2</sup>

## Compliance with US food contact legislation, FDA

Based on the information regarding the formulation, limitations on the used chemical additives as well as the results of the applicable extraction tests we confirm that this product complies with 21 C.F.R. §176.170 (“Components of paper and paperboard in contact with aqueous and fatty foods”) and 176.180 (“Components of paper and paperboard in contact with dry food”) and may be used as intended in contact with the food types I, II, III, IV-A, IV-B, V, VI-B, VII-A, VII-B, VIII and IX and under conditions of use C,D,E,F and G as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this product is compliant as food packaging material used in contact with infant\* formula or human milk only with a proper functional barrier.

\* The term “infant” refers to individuals aged 0- 6 months and “Infant food” is limited to infant formula and human milk. For more information please check with FDA Guidance on “Preparation of Food Contact Notifications for Food Contact Substances in Contact with Infant Formula and/or Human Milk”. <https://www.fda.gov/media/124714/download>

## Substances

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that we do not analyze the product for the substances listed below. Information below is based on information given by our chemical suppliers.

### Animal origin

We hereby confirm that no additive of animal origin is intentionally added during the manufacturing process of the product.

We hereby confirm that substances causing Transmissible Spongiform Encephalopathies (TSEs), including Bovine Spongiform Encephalopathy (BSE) and Creutzfeldt Jacob Disease (CJD), are not intentionally added during the manufacturing process of the product.

Based on our current knowledge, this product could qualify with vegan certification criteria.

### CMR substances

Based on the information from our suppliers of chemical additives, we can confirm that substances classified as “carcinogenic”, “mutagenic” or “toxic for reproduction” in Regulation (EC) 1272/2008 as amended, are not expected to be present in concentrations over the legislative limits in our product.

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## Dual Use Additives

The following substances are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008 and according to information from our chemical supplier may be present in the product in concentrations over 10 µg/kg foodstuff\*.

<b>Chemical substance</b>	<b>CAS-number</b>	<b>E number/ FL number</b>
Adipic acid	124-04-9	E355
Ammonium sulphate	7783-20-2	E517
Calcium carbonate	471-34-1	E170
Maleic anhydride	108-31-6	E296
Polyethyleneglycol	25322-68-3	E1521
Silicon dioxide	7631-86-9	E551
Sodium carbonate	497-19-8	E500
Sodium gulconate	527-07-1	E576
Sodium hexametaphosphate	10124-56-8	E452
Sodium hydroxide	1310-73-2	E524
Sodium nitrate	7631-99-4	E521
Sodium sulfate	7757-82	E514
Sodium sulphate	7757-82-6	E541
Sorbitan monostearate	1338-41-6	E491
Sulfuric acid	7664-93-9	E513
Sulfuric acid, aluminum salt (3:2) tetradecahydrate	16828-12-9	E520

\* Worst case calculation is based on the assumption that 1 kg food would be in contact with 6 dm<sup>2</sup> of product.

## EN 71-3 Safety of toys – Part 3: Migration of certain elements

We hereby confirm that product, before further converting, comply with the requirements of EN 71-3:2019 + A1:2021 Safety of toys – Part 3: Migration of certain elements.

## Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II as amended, the following food allergens or products derived thereof are not intentionally added during the manufacturing process of the product:

- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof\*
- Peanuts and products thereof

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- Soybeans and products thereof\*
- Milk and products thereof\*
- Nuts and products thereof\* (*Including Tree nuts; FALCPA*)
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO<sub>2</sub>.
- Lupin and products thereof
- Molluscs and products thereof

*\*Please notice the exceptions in Commission Directive 1169/2011/EC, Annex II*

Wheat and/or barley starches used in the manufacturing of product contain minor amounts of gluten. According to Commission Regulation (EC) No 828/2014 foodstuffs may be sold as 'gluten-free' if the gluten content does not exceed 20 mg/kg in the food as sold to the final consumer. Based on the worst case calculations the gluten content of product does not exceed 20 mg/kg and thus product is also considered as "gluten-free".

## **GMO**

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union\* are not intentionally added during the manufacturing of the product. However, our suppliers cannot exclude adventitious and technically unavoidable contamination\*\*.

\* *Genetically Modified Organisms (europa.eu)*

\*\* *Regulation 1831/2003 on traceability and labeling of GMO: "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."*

## **REACH Regulation (EC) 1907/2006**

We continuously monitor the development of the Candidate List of Substances of Very High Concern, the substances for authorization as well as any restrictions applicable to our use. To our knowledge and based on the information from our suppliers today we can confirm that none of our articles contains substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorisation) in a concentration above 0.1% (w/w).

## **Certified management systems at the production site/sites**

Certificates are available on the internet: <https://www.storaenso.com/en/download-centre?d=1&t=1>

## **Storage and handling requirements**

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 50-55 % relative humidity and 20-23° C. We recommend converting of the paperboard within 12 months from manufacturing date.



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For more information regarding the shelf life of the board please contact the local Stora Enso sales office.

Inkeroinen, 31 October 2023

Stora Enso Division Packaging Materials  
Ingerois Mill

Minna Vuorentausta  
Quality Service Manager

## Disclaimer

*It is the responsibility of the manufacturer of the final product/package to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application and end use. This information and its contents are subject to the following additional limitations and disclaimers:*

- Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.*
- This Declaration of Compliance is made and will be updated in accordance with applicable law. For the avoidance of doubt, we assume no liability for failing to update the document with information or changes that do not require updates of the DoC according to applicable law.*
- This information is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- Nothing in this information shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose, (c) the use, or the suitability for use, in connection with other products or materials, or (d) the safety or legality in any use, processing and handling of our products.*
- This information forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this information.*
- No one other than the addressee may rely on this information and we assume no liability whatsoever to any third party.*