

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik12 August 2022  
Dr. Dr/Hf-pfUNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITEeingetragen  
registered no.  
régiistré

57707 U 22

für  
for  
pourSCA R&D Centre  
Sidsjövägen 2  
851 21 Sundsvall  
SwedenProdukt  
Product  
ProduitSCA Star Spruce  
SCA Star Birch  
SCA Pure ECF  
SCA Pure TCF

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 and absorber 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 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,

Page 1 of 6

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

In addition, the contents of heavy metals were examined 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,

and to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

as well as the migration of certain elements to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021.

Moreover, the absence of prohibited amines and colorants according to the

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

as well as to the

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

was tested.

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 Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBI. I S. 4253), zuletzt geändert durch Artikel 7 des Gesetzes vom 27. September 2021 (BGBI. I S. 4530), §§ 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 (BGBI. I. p. 4253), last amendment by article 7 of the law of 27 September 2021 (BGBI. I p. 4530), §§ 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 225. Mitteilung, Bundesgesundheitsblatt 65 (2022) 525-526, Stand vom 01.04.2022,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 225<sup>th</sup> Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022),

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 225. Mitteilung, Bundesgesundheitsblatt 65 (2022) 525-526, Stand vom 01.04.2022,

(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 225<sup>th</sup> Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022),

and to the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 225. Mitteilung, Bundesgesundheitsblatt 65 (2022) 525-526, Stand vom 01.04.2022,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181<sup>st</sup> Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 225<sup>th</sup> Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022),

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 225. Mitteilung, Bundesgesundheitsblatt 65 (2022) 525-526,

(BfR Recommendation XXXVI/3. Absorber Pads based on Cellulosic Fibres for Food Packaging, 205<sup>th</sup> Announcement, Bundesgesundheitsblatt 45 (2002) 936, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021, including 225<sup>th</sup> Announcement, Bundesgesundheitsblatt 65 (2022) 525-526).

Furthermore, the pulp grades are in compliance with the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2021 edition), §§ 176.170 and 176.180.

Furthermore, they meet the requirements of 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,

and of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

regarding the contents of heavy metals.

The demands of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021,

and of the

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

are kept by the pulp grades.

Furthermore, they may be used for the manufacture of paper for tobacco products. Paper grades such as plug wrap, tipping and filter tipping papers manufactured with it and used in the manufacture of tobacco products are in compliance with the demands of the

Gesetz zur Umsetzung der Richtlinie über Tabakerzeugnisse und verwandte Erzeugnisse of 4 April 2016 (BGBl. I p. 569), § 5,

as well as with the

Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse of 27 April 2016 (BGBl. I p. 980), § 4, modified by article 1 of the Decree of 17 March 2017 (BGBl. I p. 1201)

and may be used as intended, as far as the pulp grades are concerned.

For the conformity assessment, the demands of the

Verordnung über Tabakerzeugnisse (Tabakverordnung) of 20 December 1977 (BGBl. I p. 2831), last amendment by article 1 of the Decree of 22 December 2014, (BGBl. I p. 2398),

were used.

Thus the pulp grades **SCA Star Spruce**, **SCA Star Birch**, **SCA Pure ECF** and **SCA Pure TCF** according to the sample material submitted may be used safely for the manufacture of papers and boards for food packaging, of cooking and hot filter papers, of baking papers and boards and absorber pads as well as of cigarette 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 6 pages.

Certification decision



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

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 6.  
La traduction des estampilles est donnée en page 6.



**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 Aschaffenburg Chamber of Industry and Commerce.

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



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, asservementé par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

---

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

A file sample of the tested material is kept at the expert's office.

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.