

Dr. Ralph Derra

Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

16 November 2017

Dr. Dr/Hh-pf

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITEeingetragen  
registered no.  
régiistré

45971 U 17

für  
for  
pourSappi Alfeld GmbH  
Mühlenmasch 1  
31061 Alfeld  
GermanyProdukt  
Product  
ProduitDesign  
Algro Design Duo  
Algro Design Card

The products manufactured by the company mentioned above are board grades which are used for food packaging.

They were examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2017 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.

Moreover, an analysis was carried out 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) 2015/720 of the European Parliament and of the Council of 29 April 2015, Official Journal of the European Union L 115/11 of 6 May 2015,

as well as to the

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

for the heavy metal contents and to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of December 2014,

for the migration of certain elements.

The board 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, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 1 des Gesetzes vom 30. Juni 2017 (BGBl. I S. 2147), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 1 of the act of 30 June 2017 (BGBl. I p. 2147), §§ 30 and 31),

and are approved according to the

Deutsche Empfehlung XXXVI zur gesundheitlichen Beurteilung von Materialien und Gegenständen für den Lebensmittelkontakt im Rahmen des Lebensmittel- und Futtermittelgesetzbuches, 34. Mitteilung, Bundesgesundheitsblatt 10, 14 (1967), einschließlich 220. Mitteilung, Bundesgesundheitsblatt 59, 1365-1368 (2016), Stand vom 01.07.2016,

(German Recommendation XXXVI for the health-related evaluation of materials and objects for the contact with foodstuffs in the frame of the Foodstuffs and Animal Feed Code, 34<sup>th</sup> memorandum, Bundesgesundheitsblatt 10, 14 (1967), including the 220<sup>th</sup> memorandum, Bundesgesundheitsblatt 59, 1365-1368 (2016), state of 1 July 2016).

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

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2017 edition), §§ 176.170 and 176.180.

In addition, the board grades are in compliance with the demands 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) 2015/720 of the European Parliament and of the Council of 29 April 2015, Official Journal of the European Union L 115/11 of 6 May 2015,

as well as 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 heavy metal contents and of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of December 2014, concerning the migration of certain elements.

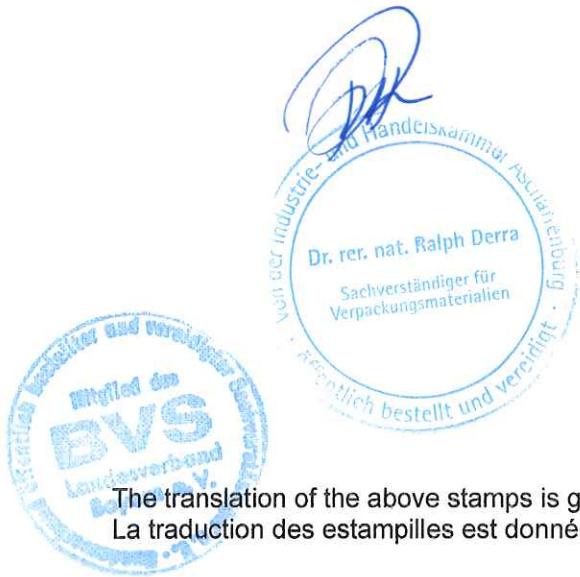
Thus the board grades Design, Algro Design Duo and Algro Design Card according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry and such fatty foodstuffs which were assigned to a correction factor of at least 3 according to Annex III, table 2 of Commission Regulation (EU) No 10/2011.

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

#### Certification decision

amtlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
Lebensmittelrechtliche Verbindlichkeit

  
(Behrendt)  
Officially certified  
and authorized food  
chemist



The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**Staatl. anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
tabenmittelrechtliche 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.

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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.