

# Declaration of Compliance

<p>Issued by:</p> <p>Mondi Neusiedler GmbH &amp; Co KG Theresienthalstraße 50 3363 Ulmerfeld-Hausmening Austria</p> <p>(hereinafter "Mondi")</p>	<p>To:</p> <p>Vanessa Caboni AUGUSTO BERNI s.p.a. Via Lambertini 23 40068 S. LAZZARO DI SAVENA (BO) Italy</p>
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**Brand Name:** BIO TOP 3 NEXT, not laminated, only folio formats and reels (hereinafter "paper")

## Composition

The paper delivered by Mondi is a 100% pure virgin fiber paper grade and no post-consumer or post-industrial recycled materials are included.

## Regulations and Guidelines

We confirm that the paper listed above complies with the requirements of the following regulations, recommendation and directive:

- Regulation (EC) No 1935/2004 -  
*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*
- Regulation (EC) No 2023/2006 -  
*COMMISSION REGULATION (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice (GMP) for materials and articles intended to come into contact with foods*
- Recommendation XXXVI/BfR -  
*Paper and board for food contact*
- Directive 94/62/EC -  
*European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste.*
- Regulation (EC) No 1907/2006 -  
*REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)*

## Description of application

The paper listed above can be used safely for food packaging for the following foodstuffs:

- direct contact with dry foodstuffs
- direct contact with fatty foodstuffs
- direct contact with moist foodstuffs

**Regulation (EC) 1935/2004** - on materials and articles intended to come into contact with food

Due to missing European legal documents (specific measure) for paper and board based food contact materials, the compliance of the paper listed above is given by fulfilling the requirements of the German Recommendation XXXVI for the given application- please see "Description of application".

**Regulation (EC) 2023/2006**- on good manufacturing practice for materials and articles intended to come into contact with food

The production of food contact materials of Mondi follows the requirements of the EN 15593:2008 Packaging (Management of hygiene in the production of packaging for foodstuffs) standard, which is periodically verified by external auditors and thereby fulfills the GMP requirements according to Reg (EC) 2023/2006.

**German Recommendation XXXVI** - on paper and board for food contact (BfR)

The paper listed above may be used safely for the given application- please see "Description of application".

**Directive 94/62/EC** - on packaging and packaging waste

The paper listed above fulfills the requirements of heavy metals concentration (the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging and packaging components shall not exceed 100 ppm by weight) of the Council Directive 94/62/EC on packaging and packaging waste.

The paper listed above fulfills the disposal requirements (in minimum one of the four listed procedures has to be confirmed):

- Reuse (EN 13429:2004 packaging - reuse)
  - not applicable
- Recovery in the form of material recycling (EN 13430:2004 packaging - requirements for packaging recovery by material recycling)
  - requirements fulfilled
- Recoverable in the form of energy recovery (EN 13431:2004 packaging - requirements for packaging recoverable in the form of energy recovery)
  - requirements fulfilled
- Packaging recoverable in the form of composting or biodegradable packaging (EN 13432:2000 packaging - requirements for packaging recoverable through composting and biodegradation)
  - Paper is generally seen as biodegradable (in order to ensure the biodegradability of complex paper structures, we recommend the verification according to EN 13432:2000 in general)

**Regulation (EC) 1907/2006** - concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

The paper listed above is regarded as "article" and no REACH registration is needed.

All suppliers of chemicals have confirmed their obligation of information towards Mondi in case of any REACH relevant changes in their product composition.

We confirm to fulfill the obligation of immediately informing on all REACH relevant changes of the paper listed above according to Regulation (EC) 1907/2006, article 33. This duty on information includes also compliance with the limit values of less than 0.1 weight percent for substances listed in the ECHA Candidate List of Substances of Very High Concern (SVHC list).

**GMO**

The used starch qualities do not belong to a genetically modified source, which is subjected to label according to Regulation (EC) 1829/2003 and Regulation (EC) 1830/2003 (supplier statements).

**Restricted substance**

The given limits of all paper significant restricted substances listed in the German Recommendation XXXVI are fulfilled for the given application/s - please see "Description of application"

**Dual use additives**

No transfer of dual use additives (intentionally added) above the given limits of Regulation (EC) 1333/2008 is expected based on the food contact application stated (see Description of application).

**Limitations**

The use of the paper is verified to be compliant for the applications listed in "Description of application", for other applications please get in contact with Mondi.

**Disclaimer**

If stored under recommended conditions (temperature between 20°C to 25°C and relative humidity between 40% to 70%) in a closed but good aerated warehouse, the paper can be used within 12 month after dispatch. After expiry of the official shelf life time it is the final users responsibility to use this paper.

Date: 31.10.2024

Signature: Tilo Herrmann (TCS&D)

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This statement is valid until 19.02.2025 or good till cancelled.