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Declaration of Compliance

Product Name: Magno Gloss

Product Description: Coated fine paper

1. General Information

Pulp composition

The above mentioned product is produced with a mixture of elementary (ECF) and totally chlorine free (TCF) bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that the above mentioned product is produced without intentional addition of any recycled materials.

Coating

Magno Gloss is two side coated, equally.

Acid content/Chloride content

The pH of *Magno Gloss* is above 7. *Magno Gloss* can be described as neutral or slightly alkaline. It has not been tested for chloride content.

2. Food Contact Status

Conditions for food contact

Magno Gloss can be used as food contact material. It can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry foodstuff. Furthermore, contact can be made with such fatty foodstuffs which were assigned to a correction factor of at least 3 according to Annex II, table 2 of Commission Regulation EU 10/2011.

Compliance with (EU) No 1935/2004

Magno Gloss complies with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. *Magno Gloss* can be applied as packaging for foodstuffs.

Compliance with (EC) No 2023/2006

Magno Gloss was 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. Full traceability of raw materials is possible through the IT systems. The producing mill has implemented a quality management system according to ISO 9001. The quality management system is externally certified.

Compliance with BfR recommendation XXXVI

Magno Gloss is approved according to BfR recommendation XXXVI in its current version (1.2.2023).

Compliance with Foodstuffs and Animal Feed Code (LFGB)

Magno Gloss is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

Compliance with (EU) No 10/2011

Magno Gloss is not within the scope of *Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food* as it is not plastic.

Compliance with FDA requirements for food packaging

Magno Gloss has not been assessed according to the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (current version of March 2023), §§ 176.170 and 176.180.

Compliance with the Swiss Ordinance on food packaging materials

Magno Gloss fulfills the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

French regulation Fiche MCDA n°4 (V02 – 01/01/2019)

The above mentioned product has not been assessed for compliance in regard to the French regulation Fiche MCDA n°4 (V02 – 01/01/2019).

3. Toy Safety

EU toy safety directive

Magno Gloss meets the requirements of Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys, including the latest amendments, for scraped-off toy materials regarding their chemical properties. It can be safely used in toys for children older than 3 years and for toys that are not intended to be placed in the mouth.

Toy safety EN 71/3

Magno Gloss has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3:2019+A1:2021: "Migration of certain elements".

Toy safety EN 71/9

Magno Gloss has been tested and found to be in compliance with the demands of the Toy Safety standard EN 71 part 9:2005: "Organic chemical compounds". The formaldehyde concentration in accordance with EN 645 and EN 1541 was confirmed to be below the limit of 30 mg/kg.

4. Relevant legislation

Compliance with EC 1907/2006 (REACH)

The regulation EC No 1907/2006 (REACH) primarily addresses chemical substances, mixtures and articles being placed on the market in the European Union (EU) / European Economic Area (EEA). Registration requirements under the REACH regulation apply to substances and as such they do not apply to the above mentioned product being placed on the EU / EEA market by Sappi. Any REACH registration obligations that apply to the raw materials (substances) being used in the manufacturing processes of our products are being met by our suppliers and we request confirmations from our suppliers that they have fulfilled those obligations.
To the best of our knowledge, no substance listed on either the Candidate List for Substances of Very High Concern (SVHC) nor any of those substances already listed in Annex XIV for Authorisation under REACH, are found in the products we are supplying to our customers at concentrations >0.1%. Amendments of the SVHC list up to and including January 23rd 2024 have been considered.
Any information that needs to be passed down the supply chain in accordance with the provision of information requirements of the REACH regulation will be communicated to you separately where required and in the appropriate format, as regulated by Article 33 of EC 1907/2006.

Compliance with 94/62/EC (Packaging)

Magno Gloss is in compliance with the Directive 94/62/EC on packaging and packaging waste, including latest amendments, regarding the content of heavy metals as specified in Article 11. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

CONEG

Magno Gloss is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

Compliance with (EU) 528/2012 (Biocides)

The preservation agents used in the production of *Magno Gloss* (e.g. in pigment slurries) comply with the Regulation (EU) 528/2012, including amendments and are used in accordance with XXXVI. recommendation of the BfR. No special biocide treatment is applied to the above mentioned product to give it an antimicrobial effect, it is therefore not a 'treated article' in sense of the Regulation (EU) 528/2012. *Magno Gloss* does not have an effect on the growth of microorganisms which is proven by a negative Hemmhof test based on DIN EN 1104.

Compliance with Directive 2011/65/EU (RoHS)

The substances restricted by EU-directive 2011/65/EC Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive) and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 have not intentionally been added to the manufacturing process of the above mentioned product. They are not expected to be present above the maximum allowed thresholds levels.

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of the above mentioned product. Updates until and including December 29th, 2023 have been considered.

Canadian Environmental Protection Act

Substances listed in Canadian Environmental Protection Act, 1999 are not intentionally added to the manufacturing process of *Magno Gloss*.

5. Miscellaneous

BSE/TSE risk

Raw materials of animal origin classified as risk materials according to COMMISSION REGULATION (EC) No 1326/2001, Annex III, are not used during the manufacture of *Magno Gloss*. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex I 3. of EU 722/2012 are applied.

Halal/Kosher

The presence of traces of substances of animal origin in *Magno Gloss* cannot be fully excluded. Neither *Magno Gloss* nor the producing mills have been assessed or certified as Kosher or Halal.

Substances of animal origin

The presence of traces of substances of animal origin in *Magno Gloss* cannot be fully excluded.

6. Information on end-of-life scenarios

Recyclability

The above mentioned product is fully recyclable in the waste paper stream. *Magno Gloss* has not been tested for its repulpability properties, but to the best of our knowledge about *Magno Gloss* composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 22 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

Biodegradability

The above mentioned product has not been tested on biodegradability or compostability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes. Our coated papers do contain fossil polymer binders in quantities above 1%. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

7. Non-use of specific substances or materials

Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of *Magno Gloss*.

MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

Radioactive substances/Radiation

During the production of above mentioned paper grade no radioactive substances are intentionally added. X-Ray measuring devices are installed in our paper machines in order to measure parameters like ash content and coating weight online. The ionizing effect of these measurements on the paper web can be considered to be negligible.

Anthraquinone

Anthraquinone (CAS 84-65-1) has not been added to the manufacturing process of the above mentioned product. Its nonpresence in the raw materials is screened regularly.

Nanomaterials

Raw materials, such as calcium carbonate, containing particles with one or more external dimensions in the nano range may be used in the manufacturing process of the above mentioned product. These particles would meet the definition of nanoparticles according to Commission Recommendation of 10 June 2022. The presence of these particles in the respective raw materials arises from a naturally occurring and/or technically unavoidable particle number-based size distribution. These particles are embedded in the paper matrix and are not anticipated to undergo migration.

Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of *Magno Gloss*, except for wheat starch, which in turn may contain gluten. Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

Glycides

Magno Gloss has not been tested for the presence of glycidyl fatty acid esters as well as glycidyl silanes, such as GLYMO or GLyEO. We do not intentionally add these chemicals to the manufacturing process and they are not expected to be present in the final product.

PFAS

Per- and polyfluoroalkyl substances (PFAS), defined as substances that contain at least one fully fluorinated methyl (CF3-) or methylene (-CF2-) carbon atom (without any H/Cl/Br/I atom attached to it), have not been intentionally added to the manufacturing process of *Magno Gloss*. These substances are not part of *Magno Gloss* formulation and they are not expected to be present in the product. *Magno Gloss* meets the demands of Danish Order No. 681 of 25th May 2020, chapter 3, §8.

Polystyrene

Solid polystyrene plastics are not used in the manufacturing process of *Magno Gloss*. In paper raw materials, water dispersions of styrene-butadiene latex can be used.

Persistant organic pollutants

None of the following substances listed in Annexes A,B, and C of the Stockholm Convention have been intentionally added during production of this product:

-Aldrin
-Chlordane
-Dieldrin
-DDT
-Endrin
-Heptachlor
-Hexachlorobenzene
-Mirex
-Toxaphene
-Polychlorinated biphenyls (PCBs) and terphenyls (PCTs)
-Dioxins and furans

None of the following substances listed in the amendments of Stockholm Convention Annexes A, B, and C in the COP decisions SC4/10-4/18, SC 5/3, SC 6/13 have been intentionally added during production of *Magno Gloss*:

- Chlordecone
-Alpha and beta hexachlorocyclohexane
-Lindane
-Hexabromobiphenyl, hexabromodiphenyl ether andheptabromodiphenyl ether
-Pentachlorobenzene
-Perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride
-Tetrabromodiphenyl and pentabromodiphenyl ethers

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of *Magno Gloss*. The amendments up to and including 30 May 2023 (EU 2023/1608) have been considered.

Titanium oxides

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of *Magno Gloss* formulation and they are not expected to be present in *Magno Gloss*.

Optical brightening agents

Optical brightening agents (OBAs) are intentionally used during the manufacture of *Magno Gloss*. These substances are used in accordance with respective BfR recommendations and FDA legislation.

PVDC

Polyvinylidene chloride (PVDC) is not addded to the manufacturing process of the above mentioned product.

Sulfur

As far as it concerns content of sulfur species, the above mentioned product is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered ‘reducible sulfur species’ according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of ‘Reducible sulfur species’ according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

Conflict minerals

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of *Magno Gloss*.

CMR Substances according to CLP legislation

During the production of *Magno Gloss*, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

Wet strength agents

Wet strength agents have not been added to the manufacturing process of the above mentioned product.

Flame retardants

No flame retardants have been added to the manufacturing process of *Magno Gloss*. We can confirm non-use of the following substances commonly used as flame retardants:

-Antimony trioxide CAS (1309-64-4)
-TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
-TBB, 2-EthylhexYl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
-Chlorinated paraffins CAS (108171-26-2)
-TCPP, Tris(l-chloro-2-propyl) phosphate CAS (13674-84-5)
-HBCD, Hexabromocyclododecane CAS (3194-55-6)
-TBBPA, Tetrabromobisphenol A CAS (79-94-7)
-TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
-TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
-Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
-Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
-Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

TSCA Section 6

No substances listed under Section 6 of the US Toxic Substances Control Act have been intentionally added to the manufacturing process of *Magno Gloss* and they are not expected to be present. At the time of the assessment the following persistent, bioaccumulative, and toxic chemical substances have been listed:

-PIP (3:1) - phenol, isopropylated phosphate (3:1) (CAS 68937-41-7)
-DecaBDE - decabromodiphenyl ether (CAS 1163-19-5)
-HCBD - hexachlorobutadiene (CAS 87-68-3)
-PCTP - pentachlorothiophenol (CAS 133-49-3)
-TTBP - 2,4,6-tris(tert-butyl)phenol (CAS 732-26-3)

Ethylene oxide-based substances

Neither ethylene oxide (CAS 75-21-8) nor poly(antimony ethylene glycoxide) (CAS 29736-75-2), nor polyethylene glycol (CAS 25322-68-3) has been intentionally added during production of *Magno Gloss*. Defoamers containing ethoxylated alcohols may be added.

Endocrine disruptors

None of the substances listed in the lists I and III of the website https://edlists.org/, administered by The Danish Environmental Protection Agency, are intentionally added during production of *Magno Gloss*.

Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of *Magno Gloss*:

-Alkylphenols and their ethoxylates
-Anthraquinone (CAS 84-65-1)
-Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
-Asbestos
-Azodicarbonamide (CAS 123-77-3)
-BAC (CAS 63449-41-2)

-BADGE, BFDGE, NOGE
-Benzene (CAS 71-43-2)
-Benzophenones
-Bisphenols
-Cadmium, lead, mercury, chromium and compounds thereof
-Chlorine and other halogens (Fluorine, Bromine, Iodine)
-Cholecalciferol (CAS 67-97-0)
-Cobalt and its compounds
-Creosote
-Cyanuric acid (CAS 108-80-5)
-DDAC (CAS 7173-51-5)
-Diisopropylnaphtalenes (DIPNs)
-Dimethylfumarate (CAS 624-49-7)
-Dioxane (CAS 123-91-1)
-Disodium guanylate (CAS 5550-12-9)
-Epoxy resins
-Ethanol (CAS 64-17-5)
-Ethylene oxide (75-21-8)
-Formaldehyde
-Glyphosate (CAS 107-83-6)
-Glycol ethers
-GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
-Hexane (CAS 110-54-3)
-Inosinate (CAS 4691-65-0)
-Isobornyl Acrylate (CAS 5888-33-5)
-Isopropyl alcohol (IPA) (CAS 67-63-0)
-Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
-Mancozeb (CAS 8018-01-7)
-Melamine (CAS 108-78-1)
-Micas
-Monosodium glutamate (CAS 142-47-2)
-Natural rubber latex materials
-N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
-Nitrosamines, Nitrites, Nitrates
-Nitrocellulose
-N-Methylpyrrolidone (NMP) (CAS 872-50-4)
-4-Nonylphenol (4-NP) (CAS 3050-88-2)
-Nonylphenolethoxylate (NPE, CAS 127087-87-0)
-Organic Peroxides
-Organotin compounds
-Orthophenylphenol (CAS 90-43-7)
-Partially hydrogenated terphenyls (HTPs)
-Pentachlorophenol (PCP)
-Pentanedione-2,4-titanium
-Perchlorates
-Pesticides and Fungicides
-Phenylalanin
-Phthalates
-Polycyclic aromatic hydrocarbons (PAHs)
-Polyvinylchloride (PVC)
-Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
-Radioactive materials, radioactive contamination
-Rayon
-Resorcinol (CAS No. 108-46-3)

-Rice plant derived substances
-Seed-bearing parts of a flowering plant (fruits)
-Sodium Antimonate A (CAS 15432-85-6)
-TAA Titanium Acetylacetonate (CAS 17501-79-0)
-Toluene (CAS 108-88-3)
-Triclosan (CAS 3380-34-5)
-Tris(4-nonylphenyl, branched and linear) phosphite
-2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
-Vinyl chloride (CAS 75-01-4)
-Volatile Organic Compounds
-Yeast
-TNPP, 4 NP and NPE

8. Disclaimer

Disclaimer

This declaration is restricted to the above mentioned product in the state it is delivered by us. This information provided in this statement applies only for the above mentioned product and may not substitute necessary end use testing. Sappi shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of *Magno Gloss* for a particular application or end use. The information given in this statement has been verified by Sappi at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available. Republishing this document is not permitted.