DECLARATION OF COMPLIANCE

Date:	2022-05-18
Manufacturer/Converter:	AR Packaging Tibro AB
Adress:	Grönhultsvägen 11 543 51 Tibro SWEDEN
Product:	Board Trays PET (Trayforma board)
Toolings/format:	413-8, 415-8, 460-8, 480-8, 495-8, 500-8, 501-8, 520-8, 530-8, 545-8, 550-8, 580-8, 590-8, 601-8, 604-8, 650-8, 655-7, 655-lid, 700-8, 710-8, 740-8, 750-8, 755-8, 772-8, 825-8. 825-lid, 840-8, 860-8, 870-8, 885-8 906-8, 920-8, 990-8, 967-8, 990-8, 1050-8, 1100-8, 1150-8, 1200-8, 1300-8, 1500-8, 1920-8, 2380-8
Material:	The information given in this certificate is based on written Declaration of Compliance and statements from our suppliers and external/internal analyses. To produce Board trays PET we convert PET coated paperboard (white), if needed by customer we are able to print the board side not the PET side of the material. The board is based on virgin fibre coated with White PET (WPET) or Black PET (BPET). The WPET/BPET side of the board is intended to be in direct contact with the food. It is the responsibility of the packer of the food to determine that the products are lawful for use in the intended application and market.
Country of origin raw material:	The board material is originated from forests in Finland, Baltic area, Poland and Sweden.
Regulations:	We declare that this product fulfils the requirements on products intended for use in contact with food as described in:
Paperboard	Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food Commission Regulation (EC) 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food BfR Recommendation XXXVI Paper and board (2017) BfR Recommendation XXXVI/2 Paper and board for baking purpose (2017)
WPET	Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food Commission Regulation (EC) 10/2011 as amended until 2020/1245 on plastic materials and articles intended to come into contact with food. Commission Regulation 2023/2006/EC on good manufacturing practice for materials and articles intended to come into contact with food. The PET coated board used based on the FDA compliance information available for each layer, our supplier has determined that the PET coated board comply with the Federal Food, Drug and Cosmetic Act and applicable food additive regulations for use in contact with all the food types up to their corresponding highest applicable conditions of use A through H as described in tables 1 and 2 of 21 C.F.R. §176.170 as well as Conditions of Use J (cooking at temperatures exceeding 250°F).

BPET	Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food Commission Regulation (EC) 10/2011 amended until 2019/37 on plastic materials and articles intended to come into contact with food Commission Regulation 2023/2006/EC on good manufacturing practice for materials and articles intended to come into contact with food
Printing:	If printing inks and varnish are used to colour the outside of the tray, the ink and varnish used are low migration ink/varnish and they are suitable for food packaging with indirect contact to the food. Please note that the food should not be in contact to the printed side of the product. The packaging is designed in a way that there is no indented direct contact with the print and therefore the printed product will be in compliance with regulation 1935/2004 on materials and articles intended to come in contact with food. The substances used producing ink and varnish are listed in the current Swiss Ordinance 817.023.21 Annex 2 or Annex 10 (as updated on 1st of May 2017)
Trayforming:	We certify that the product has been manufactured in accordance with Commission Regulation (EC) 2023/2006 on Good Manufacturing Practice and in a hygiene standard management system. We are certified according to BRC Packaging Materials, Issue 6, grade achieved: AA.
End use:	The product is intended to be used for packaging of dry, aqueous, acidic (pH <4,5), low alcoholic and fatty foodstuffs with the PET side in direct contact with food. The product is suitable for use under the following conditions of temperature and time • Freezer/fridge • Room temperature (up to 40°C for more than 24 hrs) • Hot-fill * • De-freezing and/or re-heating of food (e.g. ready meals) in microwave oven ** • Conventional oven (up to 220°C and 60 min) * It is the responsibility of the packer of the finished packages to ensure that the package is safe to use in the intended conditions 'hot-fill" means the filling of any article with a food with a temperature not exceeding 100°C at the moment of filling, after which the food cools down to 50°C or below within 60 minutes, or to 30°C or below within 150 minute. ** It is the responsibility of the packer of the finished packages to ensure that the package is safe to use in the intended conditions (W/min) taking into account all relevant information e.g. the shape and size of the package and amount and type of the packaged food.. However, in this case our supplier have evaluated the safety of Trayforma WPET/BPET for even higher temperature application than microwave oven. These results are then used as a worst case results also for evaluating safety in microwave oven use. Please also note that according to BfR XXXVI/2, temperature of 150°C must not be exceeded for the use in microwave oven. The paperboard tray is not intended for repeated usage and unequal amount of foodstuff covering the bottom of the tray. If not followed the board tray may be unequal heated causing browning of the tray.

Internal functional analysis has been performed on the paperboard trays for microwave oven use. According to our analysis we can confirm that the packaging is suitable for us in microwave using below test conditions or less watt and time:

Art nr:	Tray volume:	Frozen food weight gr)	Power (watt)	Time (min)	Result: *
1300-8 BPET 390+40	1300 ml	410	1000	12 min	OK, no defekts
750-8 WPET 310+40	750 ml	310	1000	12 min	OK, no defekts
545-8 BPET 390+40	545 ml	215	1000	12 min	OK, no defekts

* Checking for any signs of pre burn , smells , etc:

If the product is intended to be used under other conditions it is the responsibility of the packer of the finished food packages to perform tests to assure compliance.

Migration test unprinted:

Overall and specific migration test has been performed by the supplier of the PET coated paperboard, according to Commission Regulation 10/2011. The contact area to volume ratio in the migration test was 50ml/ dm^2. The overall migration limit 10mg/dm^2 and specific migration limits are not exceeded.

Overall migration test

Simulant	Contact time	Temperature (°C)	Result (mg/dm2)
3% Acetic acid	4 hours	100 °C	< 10
10% Ethanol	4 hours	100 °C	< 10
95% Ethanol	4 hours	60 °C	< 10
Iso-octane	10 days	60 °C	< 10
MPPO	1 hours	225 °C	< 10

Specific migration test

Substances with SML

Substance	CAS number	Specific migration limit SML (mg/kg food)
Terephthalic acid	100-21-0	7,5 mg/kg expressed as terephthalic acid
Isophthalic acid	121-91-5)	5,0 mg/kg expressed as isophthalic acid
Ethylene glycol + Diethylene glycol	107-21-1+111-46-6	30 mg/kg expressed as ethylene glycol
Antimony trioxide	1309-64-4	0,04 mg/kg expressed as antimony

Compliance with SML limitation for terephthalic acid, isophthalic acid, ethylene glycol and diethylene glycol antimony trioxide has been shown by migration measurements. The specific migration limit stipulated in the Commission Regulation (EU) 10/2011 is not exceeded.

Simulant	Contact time	Temperature (°C)	Result (mg/kg)
95% Ethanol	30 hours	60 °C	< 7,5 mg/kg expressed as terephthalic acid
95% Ethanol	30 hours	60 °C	< 5,0 mg/kg expressed as isophthalic acid

95% Ethanol	30 hours	60 °C	< 7,5mg/kg expressed as ethylene glycol
3 % Acetic acid	10 days	60 °C	< 0,04mg/kg (as antimony)
3 % Acetic acid	4 hours	100 °C	< 0,04mg/kg (as antimony)
10 % Ethanol	10 days	60 °C	< 0,04mg/kg (as antimony)
10 % Ethanol	4 hours	100 °C	< 0,04mg/kg (as antimony)

* *According to Article 14 of the Commission Regulation (EU) 10/2011:* In a multi-material multi-layer material or article, the composition of each plastic layer shall comply with this Regulation. Overall migration limits and specific migration limits of this Regulation do not apply to plastic layers in multi-material multi-layer materials and articles. In a multi-material multi-layer material or article, specific and overall migration limits for plastic layers and for the final material or article may be established by national law.

Dual use additives WPET: Titanium dioxide (E171) used in WPET coating and approved according to Plastic regulation EU 10/2011 and US FDA 21 C.F.R 178.3297 Colorants for polymers. Phosphoric acid (E338)

Dual use additives BPET: Phosphoric acid (E338)

Additives BPET/WPET: Carbon Black is used in BPET coating and may also be present I WPET board. Carbon black used is approved according to Plastic regulation EU 10/2011 and US FDA 21 C.F.R 178.3297 Colorants for polymers.

Phthalates: No Phthalates are intentionally added in the coated paperboard.

Bisphenol: Substances below are not used as raw material or intentionally added in the paperboard.
Bisphenol A (CAS 80-05-7)
Bisphenol B (CAS 77-40-7)
Bisphenol F (CAS 87139-40-0)
Bisphenol S (CAS 80-09-1)

GMO: Genetically Modified Organisms (GMO) as defined by European Union are not intentionally added in the production paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination.

Optical brightening agents: No optical brightening agents, OBAs, are used as raw material or intentionally added in the production of paperboard. Analysis has been performed according to EN 648. There was no visible transfer (grade 5) for any of the test fluids.

Heavy metals Cadmium (Cd) < 5 µg/l in the cold water extract of the paperboard
Lead (Pb) < 10 µg/l in the cold water extract of the paperboard
Chromium (VI) < 0,25 mg/kg as required in French DGCCRF
Mercury (Hg) < 0,3 mg/kg as required in French DGCCRF

Biocides BPR (EU) No 528/2012. All biocides, used by our supplier, are food contact approved and granted for the production of food contact materials. Our supplier carefully follow the existing German BfR XXXVI Recommendation and US FDA 21 C.F.R. demands on the use, dosage and approved residual levels of biocides.

Endocrine disruptors: EU Commission, WHO and NGOs are actively debating endocrine disruptors. There are different lists of EDCs and potential EDCs. Currently, EU Regulations are touching EDCs in biocides and pesticides. Stora Enso Liquid Packaging and Carton board Unit is closely following the development of regulatory discussion about possible endocrine disrupting chemicals. All our

products are safe at intended end-uses and they are in compliance with Regulation (EC) No 1935/2004.

Fluorinated substances: Our supplier of coated board do not use any fluorine containing active components (including PFOA and PFOS) in their production.

Mineral oils: Food packaging materials based on virgin fibres are not sources for mineral oils like recycled materials. Purity and safety of fibre based materials are reliably controlled in virgin pulping as well as paper and board making process. Origin of all virgin raw materials and chemical additives is well known. Our board supplier use only food contact approved chemicals and raw materials in the production of food contact materials. The ink and coatings used if printing the paperboard do not and have not, intentionally mineral oils in general and in particular MOSH, MOAH or PAH as part of their formulation.

Nanomaterials: Up to the present time and in general, materials used for paper and board manufacture do not contain particles which are engineered or purposefully manufactured to be in the nano scale. However, substances used in paper and board manufacture, in common with widely used materials across most manufacturing sectors, will contain naturally occurring and man-made materials which may contain a share of particles in the nano range and hence could fall within the definition of nanomaterials although they are not engineered to be nanomaterials.

Migration test printed: A migration analysis on printed trays has also been performed. The analysis has been performed according to Commission Regulation 10/2011 and 1935/2004, with an approved result. Unprinted and printed trays are formed using the same procedure, therefore the migration analysis cover both articles with regards to the forming process. Ratio of food contact surface area to volume used to establish the compliance of the material or article: 6 dm^2 for 1 kg of food.

Simulant	Test	Contact time	Temperature (°C)	Result (mg/dm2)
3% Acetic acid	Overall	4 hours	100 °C	< 10
10% Ethanol	Overall	4 hours	100 °C	< 10
95% Ethanol	Overall	30 hours	60 °C	< 10
Tenax	Overall	2 hours	175 °C	< 10
Isooctane	Overall	10 days	60 °C	< 10
Tenax	Specific	1 hour	225 °C	Compliant
3% Acetic acid	Specific	4 hours	100 °C	Compliant
95% Ethanol	Specific	30 hours	60 °C	Compliant

If more information of substances with specific migration limit and dual use substances when purchasing printed trays is needed please ask for additional document. All Substances with SML are in compliance with Regulation (EU) No 10/2011.

Sensory analysis Odor and flavor tested in 4 hours at 100 °C with food simulant water with result: No noticeable deviation of the odor or flavor.

PAA: Specific migration analyses compliant on Primary aromatic amines using 3 % acetic aid in 4 hours at 100 °C.

NIAS: Specific migration analyses compliant on non intentionally added substances using 95% ethanol in 10 days at 60 °C. and tenax 1 hour at 225 °C (GC-MS NIAS Screening)

Set off: Set off analysis performed with approved result.

REACh	Our obligation in REACh Regulation (EC) 1907/2006 are as a downstream user. Our suppliers has agreed to continuously follow the development of the Candidate List of Substances of Very High Concern. Based on the information given by supplier today we can confirm that none of our articles contains: Substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration above 0,1% (w/w). Substances included in Annex XVII, Restrictions,, where the restrictions is applicable on our use
Transport packaging:	The products can be packed in Steel cages with plastic bag and secured by plastic wrapping. The products can also be packed in corrugated boxes in different sizes packed on wood pallet. Box with plastic bag, and pallet secured by plastic wrapping. According to statements of our suppliers, transport packaging (e.g. corrugated boxes) are made in accordance with generally accepted engineering. All raw materials comply with the laws in force and are therefore suitable for food packaging. However please note, used transport packaging is partly made from recycled components and varieties. Therefore it could not exclude a migration from evaluated and unevaluated substances without the use of appropriate barrier layers. Therefore we recommend using plastic bags when packing in corrugated boxes, which is our normal way of packing our finished products.
	 
Recommended storage:	We recommend usage of the paperboard trays within 12 months from delivery date, after that date rights of claims disappear.
Waste handling:	The extrusion coated board complies with the Packaging and Packaging Waste directive 94/62/EC and its amendments. • The sum of lead, cadmium, mercury and hexavalent chromium in the board is less than 100 ppm (EN 13428). • The level of substances hazardous* to the environment in the paperboard is less than 0.1 %(EN 13428). The extrusion coated board is suitable for recovery by; • Material recycling (EN 13430) • Energy recovery (EN 13431)
Certificates:	AR Packaging Tibro AB comply to the below standards and certificates are available on below address. BRC Packaging (Quality and Hygiene standard) FSC® C122971 PEFC™ www.ar-packaging.com/en/sustainability/certifications

This certificate is valid for two years or until there is a significant change in the material, manufacturing process or in legislation.

Therese Larsson
Quality Manager
AR Packaging Tibro AB