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Verpackungsmaterialien, Boden- und Luftanalysen;
Sachverständiger in der Wasseranalytik

15 December 2022

Dr. Dr/Be-pf

**UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE**eingetragen
registered no.
registré

58589 U 22

für
for
pourProgroup Board GmbH
Horstring 12
76829 Landau
GermanyProdukt
Product
Produit

Progroup Board Wellpappformate

The products manufactured by the company mentioned above are representative cross-sections of the corrugated boards of the production program of Progroup Board GmbH which are used for food packaging.

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),

as well as of the Council of Europe's

Technical guide on paper and board used in food contact materials and articles, as of 2021, for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, the corrugated board grades were examined for the heavy metals content 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 requirements of the

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, Official Journal of the European Union L 174/88 of 1 July 2011, last amendment by Directive (EU) 2019/178 of the Commission of 16 November 2018, Official Journal of the European Union L 33/32 of 5 February 2019.

Thus, the corrugated 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, 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 (BGBl. I S. 4253), zuletzt geändert durch Artikel 7 des Gesetzes vom 27. September 2021 (BGBl. 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 (BGBl. I p. 4253), last amendment by article 7 of the law of 27 September 2021 (BGBl. 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 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 225th Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022).

The demands of the

Council of Europe Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food of 7 October 2020, sections 3.1 and 3.3,

as well as of the supplementary

Technical guide on paper and board used in food contact materials and articles, as of 2021, are met by the corrugated board grades.

Furthermore, they are in compliance with 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,

regarding the heavy metals content and the

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, Official Journal of the European Union L 174/88 of 1 July 2011, last amendment by Directive (EU) 2019/178 of the Commission of 16 November 2018, Official Journal of the European Union L 33/32 of 5 February 2019,

concerning the prohibited contents.

Thus the **Progroup Board Corrugated boards** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

The corrugated board grades do not fall within the scope of

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), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC,

as the products are no chemicals (substances or preparations) according to the definitions of article 3, but they are articles. Consequently, a registration under REACH is not necessary for them.

Nevertheless, Article 33 of Regulation (EC) No 1907/2006 requires suppliers of articles to at least name substances of very high concern which are present in the product in a concentration above 0.1%.

This certificate of compliance has a validity of 2 years and consists of 5 pages.

Certification decision



amtlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Papp
Kunststoffen, Glas, Weichblech und
sonstigen Metallverpackungen und ihre
Lebensmittelverpackungsmittel

(Behrendt)
Officially certified
and authorized food
chemist



**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, assermenté 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, assermenté 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.