

Dr. Ralph Derra

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

9 June 2026

Dr. Dr/Be-pf

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

67369 U 26

für
for
pour

Progroup Board GmbH
Prowell-Str. 1
76877 Offenbach a. d. Queich
Germany

Produkt
Product
Produit

Progroup Board corrugated cardboard formats

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 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact", current status, in connection with the BfR guideline "Testing of substance transfers from consumer articles made of paper, cardboard and paperboard", as of 28 September 2023),

and according to 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 tested for heavy metals and total organic fluorine (TOF) according to the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025,

as well as for heavy metals according to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021,

and according 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) 2024/1416 of the Commission of 13 March 2024, Official Journal of the European Union L 1416 of 21 May 2024.

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 Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 3 des Gesetzes vom 3. Februar 2026 (BGBl. 2026 I Nr. 29), §§ 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; 2022 I p.28), last amended by article 3 of the act of 3 February 2026 (BGBl. 2026 I no. 29), §§ 30 and 31),

and conform to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025).

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.

The marketability in Italy is given by the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last amended on 25 November 2022.

Considering the associated EU Guidance document, they also meet the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5, 4. and 5.,

as well as the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021,

regarding the heavy metal 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) 2024/1416 of the Commission of 13 March 2024, Official Journal of the European Union L 1416 of 21 May 2024.

concerning the prohibited contents.

Thus the **Progroup Board corrugated cardboard formats** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty food and such food which is peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty food 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 overall packaging concept, e.g. by additionally using an appropriate intermediate packaging or barrier solutions.

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, Official Journal of the European Union L 396 of 30 December 2006,

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



städtlich anerkannter Sachverständiger
zur Untersuchung der Gegenproben von
Verpackungsmitteln aus Papier, Pappe,
Kunststoffen, Glas, Weißblech und
sonstigen Metallverpackungen auf ihre
Lebensmittelsicherheit und Bedenklichkeit


(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 Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce.

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 Zertifizierungsstelle 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 certification body's office.
This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.