LECTA (TORRASPAPEL S.A., CONDAT SAS, CARTIERE DEL GARDA SpA)
Main Operational Offices
Llull 331, 08019 Barcelona (Spain)

Barcelona, August 2022

Ref.: MINERAL OILS IN DIVA ART AND DIVA ART DUO.

Dear customer,

Thank you very much for your enquiry about the content of Mineral Oils Hydrocarbons (MOSH / MOAH) regarding our Diva Art and Diva Art Duo products.

The information contained in this document is based on our knowledge of the raw materials and according to information provided by the raw material suppliers, on paper manufacturing processes, product handling & storage practices and on the information provided by our external legal consulting experts on the subject, on the effective date of this document.

1. DEFINITION OF MINERAL OIL:

The abbreviation "MOSH/MOAH" has been established as a (generic) term for all substances derived from mineral oils hydrocarbons (MOH), including also chemical analogues from non-mineral oil sources (such as waxes, polymers, etc… named MORE, PAO, POSH):

- MOSH (Mineral Oil Satured Hydrocarbons)
- MOAH (Mineral Oil Aromatic Hydrocarbons)

There are mineral oils of different grades:

· Technical Grade ……(15% - 35% of MOAH)
· Food Grade ……(minimized MOAH).

2. MINERAL OILS IN DIVA ART AND DIVA ART DUO - STATUS:

According the information of our suppliers, it may have used as antifoamer a very small amount white mineral oil, food contact and pharma grade, analog of MOSH, in the manufacturing proccess of these products manufactured by us.

That antifoamer is a not controversial MOSH/MOAH and it is approved food additive and technical co-adjuvant.
It is of the range of mineral oil analogues applied in many areas and stages of food transformation, and do not release low molecular weight hydrocarbons.

These kind of mineral oil analogues are permitted and often technologically necessary applications. In these cases, the substances are usually purified products, which are derived from refined mineral oils or white oils, and approved as food contact additives, and co-adjuvants for cosmetic, medical and pharmaceutical end uses.

We also guarantee the control in our papers of content and migration of substances (mineral oils among others) and compliance with current legislation and recommendations.

All of our food-grade papers have been analyzed by an independent accredited external laboratory with a great experience on the assessment of paper and packaging.

Our certification of the compliance with direct food contact requirements has included the assessment of the content and the migration of MOH (MOSH, MOAH and other analogues), based in the French law n°2020-105 of February 10, 2020 (Loi n° 2020-105 relative à la lutte contre le gaspillage et à l'économie circulaire), the Decree no. 2020-1725 and the draft of the German Mineral Oil Ordinance: All of our Food contact grade papers have been approved.

No migration to food has been detected so it can be considered that there is no danger in order to guarantee the health of consumers and care for the environment and we guarantee the control of content and migration of substances (mineral oils among others) and compliance with current legislation and recommendations.

Additionally to these periodic certification processes in an accredited external laboratory to verify the absence of content and migration of Mineral Oils (MOSH / MOAH) or MOSH analogues, please note that Lecta does not *routinely* test the subject products for MOSH / MOAH, does not routinely test purchased goods (including raw materials, production aids, consumables and transit packaging) for these substances and nor does it require its suppliers to carry out testing for these substances.

Our Company is committed to avoiding the transfer of hydrocarbons from unwanted mineral oils to food and environment. As it has been demonstrated from several product trials and reviews, the measures implemented so far have yielded tangible results. The prerequisites for effective prevention are process analyses, the expansion of findings and their strict application at the industrial level.

The origin of mineral oils are very wide and has several sources in nature, and its detection in food or in the environment can come not only from packaging materials but also from other origins such as food itself, lubricants, food manufacturing chain, food additives, anti-dusting materials for grains, processing aids, ...

3. LEGISLATION:

The presence of mineral hydrocarbons has been a cause for concern in almost all sectors of the food and packaging industry, raw materials suppliers, third part laboratories,…for several years, both from the point of view of consumers health care (food contact compliance) and the environment.

If you need additional documentation related to Mineral Oils, please contact our Commercial team.

4. NOTE:

This document is not a Certification of Compliance or a Statement.

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Sincerely,

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