

22nd June, 2023**PRODUCT SAFETY STATEMENT****ALASKA® BARRIER GREASE PRODUCTS**

We hereby declare that these ALASKA® dispersion coated barrier board products are monomaterial products consisting of three-ply paperboard enhanced with water-based dispersion layers.

Products are manufactured in compliance with Commission Regulation (EC) No 2023/2006 good manufacturing practice for materials intended to come into contact with food and quality management system certified according to ISO 9001 and ISO 22000.

SPECIFIC INSTRUCTIONS FOR SAFE AND APPROPRIATE USE

In terms of the product safety this barrier board is suitable to use for packaging dry, aqueous, fatty foods with a pH \geq 4.5 and under the following conditions. Please note barrier coated, back side of the board is intended to be contact with food.

- For dry and fatty as well as aqueous and fatty foods long term storage conditions, including when packaged under hot-fill conditions, and/ or heating up to a temperature 70 °C for up to two hours or to 100 °C for up to 15 minutes
- Freezer/fridge
- Overall migration tests 10/2011 2h/70°C, 24h/50°C and TENAX® 10d/ 40°C: Test conditions representative of the most unfavorable foreseeable conditions of use of the material.

When converting these paperboards each part of the converting chain is responsible of the suitability for the intended end-use. Converter needs to take into account and test possible limitations of the product before use.

This document adds up the written information from our suppliers, analysis performed on representative paperboard samples and the certificate of compliance given by accredited independent research laboratory.

We hereby declare that the compliance of ALASKA® BARRIER GREASE board as a multilayered monomaterial product is fully covered under the following regulations. Compliance of separate barrier layer or board only is not applicable.



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FOOD CONTACT**Declaration of Compliance**

has been confirmed by independent accredited laboratory as follows

- European Parliament and Council Regulation (EC) 1935/2004/EC
- BfR recommendation no. XXXVI, 1.4.2022, Germany
 - In terms of its chemical composition the Product represented by the samples tested is suitable as food contact material for both both dry and non-fatty foods as well as moist and fatty foods at temperatures up to 90°C. Applications involving moist and fatty foods is allowed, provided that back surface is in direct contact with foods.
- FDA regulations, 21 CFR, parts 170 – 189, 1 April 2022, USA
 - In terms of its chemical composition, the board is suitable to be in contact with dry foods and non-fatty solids (food type VIII) and aqueous and fatty food types I, II, III, IV-A, IV-B, V, VI-B, VII-A, VII-B and IX which are listed in Table 21 CFR 176.170 © at room temperatures or below, no thermal treatment in the container.

Compliance of specific board delivery is confirmed by corresponding order confirmation and/or by product labelling.

The appropriate handling and storage conditions (in RH50%, 23°C) of product shall be utilized to ensure the safe use. We recommend converting of the paperboard within twelve months from manufacturing date.

COMPLIANCE TO

- Foodstuffs, consumer Goods and Animal Feed Code in the version of the notification of 3rd of June 2013 (BGBl. p. 1426), last amendment 27 June 2020, §§ 30 and 31
- The French General Directorate for Competition Policy, Consumer Affairs and Fraud Control (DGCCRF) -Fiche MCDA No 4) for food contact materials.
- SWISS Ordinance of the FUAO and FDHA on materials and articles intended to come into contact with foodstuffs
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council, and its amendment commission Regulation (EC) No 552/2009, phthalates in toys and childcare articles
- EN 71-3:2013 Safety of Toys: Migration of certain elements
- EN 71-9:2008 Safety of Toys: Organic chemical compounds
- Regulation EC 94/62 Packaging and Packaging Waste directive and its amendment
- U.S. Model Toxics in Packaging Legislation (CONEG/TPCH)
- 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 (RoHS) and amendments



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have been confirmed by accredited laboratory.

- MM Kotkamills Boards Oy operates according to the Industry Guideline for the Compliance of paper and board materials and articles for food contact. More information on the guideline can be found on the following web site; <http://www.cepi.org/mediacentre/publications>

RAW MATERIALS

FIBRES

All the fibers used in board products are covered by CoC certifications and the obligations of the European Union Timber Regulation (EU TR 995/2010) and Due Diligence System (DDS).

Our board products are manufactured from 100% virgin forest fibres.

Main Species are Pine (Pinus Sylvestris), Spruce (Picea Abies), Birch (Betula spp), Eucalyptus

Absence of recycled fiber excludes the possible risk from non-intentionally added substances (NIAS) and traces of printing inks or mineral oils.

The pulps used in MM Kotkamills' boards are;

- CTMP from chlorine free bleaching process
- Elemental chlorine free (ECF) chemical pulps

Mineral oil (MOSH/MOAH)

Mineral oils typically originate from recycled fiber material and inks. MM Kotkamills Boards Oy's boards contain only virgin fibres avoiding the topic of harmful mineral oils. Mineral oils are not added or used as raw materials in the manufacturing of this product.

OTHER RAW MATERIALS

Reach

Our paper and board grades are defined as articles. Thus, registration doesn't apply for our paper and board grades.

All chemicals and additives used by MM Kotkamills Boards Oy as downstream user fulfill the REACH requirements. We do not intentionally add any substances containing above 0.1% (W/W) of Substance of Very High Concern (SVHC) that will be published on the Candidate list. We continuously follow the development of the candidate list and the substances for authorization.



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Food Contact Requirements

All products are regularly tested by independent third party laboratory for food contact suitability. The raw materials we use are under foreseeable conditions, and as confirmed by writing by our suppliers, approved according to the

- German recommendation XXXVI of BfR and
- USA regulations of FDA, 21 CFR, parts 170 – 189

Substances with Specific migration limits, SML

Based on the written confirmation of our suppliers, substances having SML restrictions either in regulations mentioned earlier or according to

- German regulation BfR XIV Polymer Dispersions and
- Commission Regulation (EU) no. 10/2011

are given below and are not to be exceeded as determined by a worst-case calculation

Substance	CAS-number	SML (specific migration limit)
Acrylic Acid / esters	CAS 79-10-7/ --	SML(T) = 6 mg/kg
Butadiene	CAS 106-99-0	SML = 1 mg/kg
Emulsifiers	Total Migration Limit	= 5 mg/dm ²
Ethylene Oxide	CAS 72-21-8	SML = Not detectable, restr. 1 mg/kg
Propylene Oxide	CAS 75-56-9	SML = Not detectable, restr. 1 mg/kg
Methacrylic Acid / esters	CAS 79-41-4 / --	SML(T) = 6 mg/kg
n-Butyl acrylate	CAS 141-32-2	SML = 6 mg/kg
Peroxide		SML(T) = 0,05 mg/kg
Polyethylene glycol (EO = 1-50) ethers of linear and branched primary (C8-C22) alcohols		SML = 1,8 mg/kg
Sodium dioctyl sulfosuccinate	CAS 1639-66-3	SML = 5 mg/kg
Sulphosuccinic acid alkyl (C4-C20) or Cyclohexyl diesters, salts		SML = 5 mg/kg
Vinyl acetate	CAS 108-05-04	SML = 12 mg/kg



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Dual Use Additives

Based on the information given of the raw materials and on the knowledge of the manufacturing process, the following dual use additives can be present;

<u>Substance</u>	<u>E number</u>	<u>ADI (Acceptable Daily Intake)</u>
Titanium dioxide	(E171)	
Sodium metabisulphite	(E223)	ADI for E220-E228 0,7 mg/kg
Sodium nitrate	(E251)	ADI for E251-E252 3,7 mg/kg
Sodium acetate	(E262)	
Butylated hydroxytoluene	(E321)	ADI 0,3 mg/kg
Citric acid	(E330)	
Adipic acid	(E355)	ADI for E355-E357 5 mg/kg
Xanthan gum	(E415)	
Sorbitan monolaurate	(E493)	ADI for E491-E495 25 mg/kg
Sorbitan monostearate	(E491)	ADI for E491-E495 25 mg/kg
Sodium bicarbonate	(E500)	
Sodium chloride	(E507)	
Sulfuric acid	(E513)	
Sodium sulphate	(E514)	
Aluminum sulfate	(E520)	ADI 0,4 mg/kg
Hydroxides	(E524-528)	
Silicon dioxide	(E551)	
Magnesium silicate	(E553a)	
Talc	(E553b)	
Microcrystalline wax	(E905)	
Polyethylene glycol	(E1521)	ADI 10 mg/kg

Generally Modified Organisms (GMO)

as defined by European Union are not intentionally added in the production of paperboard.

Allergens

Substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of our product.

However, raw materials may contain wheat. Based on the information given by our supplier, the gluten content of the final product does not exceed 20 mg/kg. According to "Commission Regulation (EC) No 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten" and "Food Labeling; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA" gluten free labelling for food can be used if the gluten content does not exceed 20 ppm (= 20 mg/kg).

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Animal origin

Based on the given information by our chemical suppliers, no additive of animal origin is intentionally added in the production of board.

ANALYSES

Migration tests for ALASKA® BARRIER GREASE board was performed according to (EU) no. 10/2011 and FDA 176.170. ALASKA® BARRIER GREASE boards are produced of paperboard and water based dispersion layer(s) which are used only as a water and grease repellent coating and adhesive. As there is no relevant regulation to this kind of product, migration tests are performed according to (EU) 10/2011.

Overall Migration tests

Overall migration test was done with flat sheets and carried out according to the SFS-EN 1186-1 and SFS-EN 1186-5 and EN14338. Surface to specific simulant volume ratio is given in the table below. The test condition was 2h +70 °C, 24h +50°C and 10 d +40°C. The results are average on three parallel tests. The overall migration limit 10 mg/dm² stipulated in the Commission Regulation (EU) no. 10/2011 are not exceeded.

Simulant	Contact time	Temperature (°C)	Surface to simulant volume ratio, dm ² / ml	Overall migration limit, mg/dm ²
50 % ethanol	2 h	70 °C	2,3 / 100	< 10
95 % ethanol	24 h	50 °C	2,3 / 100	< 10
Iso-octane	24 h	50 °C	2,3 / 100	< 10
TENAX	10 d	40 °C	2,3 / 100	< 10

FDA-extractions

FDA Food Contact Article test in accordance with 21 CFR 176.170. The following extractions have been performed in migration cell, barrier as contact side.

Extractives in water 24h, 120 °F (mg/inch ²)	Extractives in Chloroform (mg/inch ²)	Extractives in heptane 30 min 70 °F (mg/inch ²)
1,3	< 0,5	< 0,5

Migration of antimicrobial agents

Absence of inhibition zones have been confirmed by standard EN 1104 (Hemmhof-test).



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Phthalates

were not detected by analysis with GC/MS

Bisphenols

In production of ALASKA® board grades Bisphenols are not intentionally added to the products. Bisphenol A and S are not detected in the analyses.

Formaldehyde

In production of ALASKA® board grades formaldehyde is not intentionally added to the products nor detected in the analyses.

Metals

Metals from cold water extract with method SFS-EN ISO 17294-2

Metal	Cadmium, Cd	Mercury, Hg	Lead, Pb	Chromium, Cr
Content	<0,001	<0,001	<0,004	<0,013
Unit	mg/kg	mg/kg	mg/kg	mg/kg

Total PCB

Content according to EN ISO 15318 is below determination limit (0,20 mg/kg)

Total PCP

Content according to EN ISO 15320 is below determination limit (0,03 mg/kg)

Optical Brighteners (OBA)

In Production of ALASKA® BARRIER GREASE optical brighteners are used to control the shade and brightness of the products. The fastness of fluorescent whitening agents is determined according to EN 648 (long duration contact) by external laboratory.



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CERTIFIED MANAGEMENT SYSTEMS AT THE PRODUCTION SITE

ISO 9001:2015	No. 1405
ISO 14001:2015	No. 1535
ISO 22000:2018	No. 9486
ISO 45001:2018	No. 1965
PEFC ST 2002:2013, PEFC ST 2001:2008 v2	No. 2177
FSC-STD-40-003 (2.1), FSC-STD-40-004 (3.0), FSC-STD-40-005 (3.1), FSC-STD-40-007 (2.0)	INS-COC-100038/ INS-CW-100038

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DISCLAIMER

This certificate is only valid to the extent it has been signed and delivered by an authorized employee of MM Kotkamills and based on the delivery contract between MM Kotkamills and the addressee. It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application. The contents and the information set out herein is accurate to our current knowledge only. This information is only valid as of its date of publication or as confirmed in order documents and we assume no liability for subsequent changes in regulatory requirements, information, processes or other contents. MM Kotkamills makes no other warranty of any kind, express or implied, by contract, statute, or otherwise, and MM Kotkamills expressly excludes and disclaims all implied warranties of merchantability or fitness for a particular purpose or otherwise. Any copying, distribution, sending or publication of information in this Declaration is prohibited without prior written consent.