PAPERBOARDS AND SPECIALTY PAPERS DIVISION

Enduring Value

Version: 2
DC: CL/GEN/PSPD/BCM/004 Date: 20th June 2018

Declaration of Compliance to Regulatory Requirements for Paper and Paper Board

Trade name	:	Carte Lumina
Product description	:	Coated Folding Box Board(GC1 and GC2)
Base board grammage	:	200 g/m^2 to 415 g/m^2
Coating	:	The Board is double coated on the top side For more information see technical specification.
Fiber source	:	Virgin fiber
Bleaching	:	All pulps used are elementary chlorine free (ECF-pulps)
Production site	:	Carte Lumina is manufactured at unit: Bhadrachalam
Producer	:	ITC Limited, Paperboards and Specialty papers Division

CUSTOMER NAME	ANGELO MORINELLI, ITALY
SUBMITTED BY	JAYA LAKSHMI
DATE OF SUBMISSION	02.07.2018

REMARKS:

This Compliance Certificate contains the following information about the Product

1. **Specific instructions for safe and appropriate use**
2. **Food contact**
   - **2.1. Raw Materials**
   - **2.2. Analyses/FDA-extractions**
   - **2.3. Analyses/ Paperboard**
   - **2.4. RoHS Compliance**
   - **2.5. PCP in paperboard**
   - **2.6. Antimicrobial test**
   - **2.7. Dioxin in paperboard**
   - **2.8. Benzophenone in paperboard**
3. **Substances/ Paperboard**
   - **3.1. GMO**
   - **3.2. Animal Origin**
   - **3.3. BSE**
   - **3.4. Food allergens**
   - **3.5. Phthalates**
   - **3.6. Mineral oil Migration (MOAH & MOSH)**
4. **Additional legislation and regulations, not food related**
   - **4.1. Packaging and Packaging Waste Directive**
   - **4.2. REACH**
5. **Certified management systems at the production site/sites**
6. **Storage and handling requirements**

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1. Specific instructions for safe and appropriate use

Carte Lumina is intended for packaging dry foodstuffs, aqueous, acidic, low alcoholic < 5% (v/v) and fatty foodstuffs.
The information given in this certificate is based on written confirmations of our chemical suppliers as well as evaluations and analyses made by and the certificate of compliance given by an independent research laboratory, TUV NORD GROUP, Product Certification Services.
Please note that the top clay coated side of the board is suitable for printing and is generally not intended for contact with any food.
Carte Lumina is suitable for use under the following conditions of temperature and time. Please also see storage conditions.

- Freezer/fridge (-20°C to 5°C more than 24 hrs)
- Room temperature (up to 40°C for more than 24 hrs)

With aqueous, acidic and fatty foodstuffs also

- Hot-fill (heating up to 70°C for up to 2h or heating up to 100°C for up to 15min)
- Microwave oven *
- Conventional oven (max. 220°C and 30 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 (W/min) taking into account all relevant information e.g. the shape and size of the package and packaged food.

2. Food contact

We hereby declare that the Carte Lumina before conversion complies where applicable and under foreseeable Conditions of use with the relevant requirements of;
Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

2.1. Raw materials

Paperboard
For the purpose to achieve high chemical and microbiological purity only virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms to established technology involving the use of generally recognized chemicals. All chemical additives used as raw materials for the paperboard are mentioned in the following regulations. Information below is based on the written confirmation of our chemical suppliers and analysis performed on the paperboard.

The **paperboard** complies where applicable and under foreseeable conditions of use with;

- Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- German BfR Recommendation XXXVI, Paper and board (2009)
- German BfR Recommendation XXXVI/2, Paper and board (2009)
- US FDA CFR 21, §176.170: Paper and Paperboard Components (2010)
- US FDA CFR 21, §176.180: Paper and Paperboard Components (2010)

Fluorescent whitening agents
We hereby confirm that fluorescent whitening agents or optical brightening agents are added in the production of the board.

2.2. Analyses / FDA-extractions

FDA-extractions

The following extractions have been performed on representative samples of **Carte Lumina** to meet the FDA 21 CFR §176.170 and 176.180 and BfR 36 BGVV Guidelines The limits stipulated in the FDA 21 CFR § 176.170 and 180, BfR 36 BGVV have not exceeded.

Simulant	Contact Time	Temperature	Extractives(mg/in²)	LOQ (mg/in²)
Water	2 hours	250ºF	<0.5	≤ 0.5
Water	48 hours	70ºF	<0.5	≤ 0.5
n-heptane	2 hours	150ºF	<0.5	≤ 0.5
n-heptane	30 minutes	150ºF	<0.5	≤ 0.5
n-heptane	2 hours	70ºF	<0.5	≤ 0.5
n-heptane	30 minutes	70ºF	<0.5	≤ 0.5
10 % alcohol	2 hours	150ºF	<0.5	≤ 0.5
10 % alcohol	48 hours	150ºF	<0.5	≤ 0.5
10 % alcohol	2 hours	70ºF	<0.5	≤ 0.5
20 % alcohol	48 hours	70ºF	<0.5	≤ 0.5
20 % alcohol	2 hours	150ºF	<0.5	≤ 0.5
50 % alcohol	2 hours	150ºF	<0.5	≤ 0.5
50 % alcohol	48 hours	70ºF	<0.5	≤ 0.5
50 % alcohol	48 hours	70ºF	<0.5	≤ 0.5
Acetic Acid	2 hrs	150°C	<0.5	≤ 0.5
Acetic Acid	48 hrs	70°C	<0.5	≤ 0.5

2.3. Analyses / Paperboard

Heavy metals in paperboard

The **Carte Lumina** complies with the requirements in BfR Empfehlungen XXXVI, Paper and Board (2009).

Cadmium (Cd)	< 0.1 mg/kg
Mercury (Hg)	< 0.1 mg/kg
Lead (Pb)	< 1 mg/kg
Arsenic (As)	*<0.1mg/kg*
Antimony (Sb)	*<0.1mg/kg*
Hexavalent Chromium	*<0.5mg/Kg*
Tin	*<1mg/Kg*
Tungsten	*<1mg/Kg*
Gold	*<1mg/kg*

2.4. RoHS Compliance

The **paperboard** complies with the requirements of **RoHS Directive 2011/65/EU**.

2.5. PCP in paperboard

The **paperboard** complies with the requirements for pentachlorophenol (PCP) in BfR Empfehlungen XXXVI, Paper and Board (2009). Analysis have been performed on representative board samples for pentachlorophenol (PCP) according to EN ISO15320. The amount of PCP is < 0.15 mg/kg which is the acceptable limit.

2.6. Antimicrobial test

The **paperboard** fulfils the requirements in BfR XXXVI. Determinations have been performed on representative board samples regarding the transfer of antimicrobial constituents according to EN 1104.There was no inhibition zone detected i.e there was no transfer of antimicrobial constituents. We do not add surface biocides on top of the board which can also be seen in the result.

2.7. Dioxin in paperboard

The content of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) expressed in World Health Organization (WHO) and NATO/CCMS toxic equivalents in paperboard are below 1 ng/kg board. The **paperboard** does not contain "dioxin-like" coplanar polychlorinated biphenyls (PCBs) above 0.1mg/dm² board.

2.8. Benzophenone in paperboard

The **paperboard** complies with the requirements for benzophenone in BfR Empfehlungen XXXVI(Annexe I). Analysis have been performed on representative board samples for benzophenone. The amount of benzophenone is < 0.1 mg/dm^2 which is the acceptable limit.

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3. Substances / Paperboard

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that we do not analyze the board for the substances listed below.

Nano Material: No Nano material is used in the manufacture of the product

3.1. GMO

We hereby confirm that genetically Modified Organisms (GMO) in accordance with "Environmental site on GMO" are **not** intentionally added in the production of board. Our suppliers can however not exclude adventitious and technically unavoidable contamination. This information is based upon information given by our chemical suppliers.
http://ec.europa.eu/environment/biotechnology/index_en.htm and
http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/04/85&format=HTML&aged=0&language=EN&guiLanguage=en
Regulation 1830/2003 on traceability and labeling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

3.2. Animal origin

We hereby confirm that no additive of animal origin is intentionally added in the production of board. This information is based upon information given by our chemical suppliers. Hence it reaches Halal Requirements

3.3. BSE

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and CreutzfeldtJakob Disease, JCD is intentionally added in the production of board. This information is based upon information given by our chemical suppliers.

3.4. Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the EU Directive 2003/89/EC, the following food allergens or products derived thereof are **not** intentionally added for the manufacture of board:

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof
- Nuts and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO_2.

Consequently the products may reasonably be expected not to contain allergenic proteins. This information is based upon information given by our chemical suppliers.

3.5. Phthalates and Chemicals under RoHS

We hereby confirm that no phthalates and chemicals listed under RoHS are intentionally added in the production of **Carte Lumina** This information is based upon information given by our chemical suppliers and tests done on the product.

3.6.Mineral oil migration(MOAH and MOSH):

ITC LTD –PSPD does not guarantee any limits on MOAH (Mineral oil aromatic hydrocarbons) and MOSH
(Mineral oil saturated hydrocarbons) in this product. It can vary from lot to lot MOAH and MOSH can penetrate and migrate to the paper boards from other sources when suitable and acceptable barrier coatings are not provided. As per 3rd Party laboratory test analysis results, MOSH & MOAH not detected in our board.

4. Additional legislation and regulations, not food related

4.1. Packaging and Packaging Waste Directive

Carte Lumina complies with the Packaging and Packaging Waste directive 94/62/EC amended by 2004/12/EC.

- 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 board is less than 0.1 %(EN 13428).

The board is suitable for recovery by;

- Material recycling (EN 13430)
- Energy recovery (EN 13431)

4.2. REACH

The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of properties of chemical substances. The REACH regulation gives greater responsibility to industry to manage the risks from chemicals and to provide safety information on the substances. REACH requires an extensive information exchange in the supply chain in order to fulfil all obligations.

Our obligations in REACH are as a downstream user and as a manufacturer of substances and articles. To secure REACH compliance from our suppliers we have insisted on compliance to REACH . For the substances that we manufacture and where REACH demands registration we have done or we will do the registrations according to the timelines set in the REACH regulation.

Cellulose pulp is defined as a substance and exempted from registration according to appendix IV. Our paper and board grades are defined as articles without intended release according to REACH. Consequently this means that registration doesn't apply for our paper and board grades.

If any of our articles contains above 0.1% (w/w) of a **S**ubstance of **V**ery **H**igh **C**oncern that will be published on the Candidate List we will inform you as REACH requires. We continuously follow the development of the Candidate List and the substances for authorization. To our knowledge today none of our articles contain any **S**ubstance of **V**ery **H**igh **C**oncern that is on the Candidate List in a concentration above 0.1% (w/w).

5. Certified management systems at the production site/sites

Different Certifications are as follows: *Board production*
ISO 9001
ISO 14001
OHSAS 18001
FSC® CoC
BRC/IOP

6. Storage and handling requirements

In order to secure/ensure product safety the product must be well wrapped and stored indoor, sheltered from rain and snow. The recommended storage conditions are at 55-65 % relative humidity and 20-25° C. We recommend consumption within 12 months from manufacturing date and after this time rights of claims normally disappear.

PAPERBOARDS AND SPECIALTY PAPERS DIVISION

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Disclaimer

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. This certificate and its contents are subject to the following additional limitations and disclaimers:

- **Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.**
- **This certificate is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, regulatory requirements or otherwise.**
- **This certificate is only valid to the extent it has been signed and delivered by an authorized employee of the ITC Ltd -PSPD group.**
- **Nothing in this certificate shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose, (c) the use, or the suitability for use, in connection with other products or materials, or (e) the safety or legality in any use, processing and handling of our products.**
- **This certificate forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this certificate.**
- **No one other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party**

20th June 2018

Mohammed Gouse
Manager - Product Development

ITC Ltd-PSPD
Unit:Bhadrachalam
P.B No.4 Sarapaka village
Bhadrachalam-507 128
Tel 91-8764-242331-333
Fax 91-8764-242460

ITC Ltd-PSPD
ITC Bhadrachalam House
106,Sardar Patel Road
Secunderabad-500 003
Tel 91-40-27846566-73
Fax 91-40-27846566

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Part of the Cotecna Group

CUSTOMER
ITC-ILTD DIVISION
Grand Trunk Road P.O. box n. 317
522004 GUNTUR INDIA

MODENA, li 21/07/2020

Sample arrived on the 11/06/2020
Registration date 12/06/2020

TEST REPORT nr. 20F08916-In-0

SAMPLE 20F08916
MATRIX: Packaging

Description provided by Customer: ITC CARTE LUMINA "4"

THE SAMPLE HAS BEEN TAKEN BY THE CUSTOMER. THE TRANSPORT HAS BEEN MADE BY COURIER.
Sample Condition on Receipt: Room temperature

ANALYSIS DESCRIPTION	RESULT	U	REC. %	UNIT OF MEASURE	LQ	LD	METHOD	ANALYSES BEGINNING DATE / ENDING DATE
Composition requirements for paper and cardboard intended for food products (D. M. 21/03/1973 and following updatings and amendments.)								
Fillers	5,5	± 0,3		g/100 g on dry matter	0,1		DM 21/03/73 GU N°104 del 20/04/73 sezione 6	*17/06/2020 / 01/07/2020*
Auxiliary substances	4,0	± 0,5		g/100 g on dry matter	0,5		DM 21/03/73 GU N°104 del 20/04/73 sezione 6	*17/06/2020 / 01/07/2020*
Fibre materials	90,5	± 0,9		g/100 g on dry matter			DM 21/03/73 GU N°104 del 20/04/73 sezione 6	*17/06/2020 / 01/07/2020*
Moisture paper and cardboard	6,9	± 0,2		g/100 g	0,1		DM 21/03/73 GU N°104 del 20/04/73 sezione 6	*17/06/2020 / 01/07/2020*
Requirements for paper and cardboard intented for food products (D.M. 21/03/1973 and following updatings and amendments).								
Determination of the fastness of fluorescent whitened paper and board EN 648)	With reference to the standard UNI EN 648 both sides of the sample shows: - in water: fastness 5 - in acetic acid 3% (m/v): fastness 5 - in alkaline salt solution: fastness 5 - in vegetable oil: fastness 5 By procedure A for long duration contact: 24h (23+/-2) °C (Index 1 = weak fastness; Index 5 = good fastness)						* EN 648 - 2019	*17/06/2020 / 01/07/2020*
Migration of formic aldehyde in water *- Limite (D.M. 21/03/1973 e smi): 0,5*	< LQ			mg/dm2	0,03		* MS-HCHO 2014 Rev.1	*17/06/2020 / 29/06/2020*
Migration of Phenols and Cresols in water *- Limite (D.M. 21/03/1973 e smi): 0,2*	< LQ			mg/dm2	0,04		* MS-FENOLI 2014 Rev.1 - UV-VIS	*17/06/2020 / 25/06/2020*
Migration of lead in acetic acid 3% at 40°C for 24 hours *- Limite (D.M. 21/03/1973 e smi): 3*	0,10			µg/dm2	0,1		05(ICP-MS) 2018 Rev.3	*17/06/2020 / 01/07/2020*
PCB-15	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-18	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-20	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-28	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-35	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-52	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-77	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-101	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-118	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-126	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-138	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-153	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*
PCB-169	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020 / 21/07/2020*

Continued...

CUSTOMER
ITC-ILTD DIVISION
Grand Trunk Road P.O. box n. 317
522004 GUNTUR INDIA

MODENA, li 21/07/2020

Sample arrived on the 11/06/2020
Registration date 12/06/2020

TEST REPORT nr. 20F08916-In-0

SAMPLE 20F08916
MATRIX: Packaging

ANALYSIS DESCRIPTION	RESULT	U	REC. %	UNIT OF MEASURE	LQ	LD	METHOD	ANALYSES BEGINNING DATE / ENDING DATE
PCB-180	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020* / 21/07/2020
PCB-194	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020* / 21/07/2020
PCB-209	< LQ			mg/kg	0,005		* PCB-carton 2014 Rev.2 - GC-ECD	*17/06/2020* / 21/07/2020

END TEST REPORT

The original document is a PDF file with Digital Signature: 20F08916-In-0-DigitalSignature.pdf

Notes and method reference:
Analysis performed on the sample as it is.

< LQ: = lower than Quantification Limit.
DECISIONAL RULE: Unless otherwise stated by Standards or Legal Requirements or by specific customer requests, the following rule regarding measurement uncertainty applies: the sample is considered non-compliant in the event that the extent of exceeding the maximum permitted limit is greater than the measurement uncertainty (R-U> LM). The uncertainty reported in the Test Report is considered.
R = Result
U = extended measurement uncertainty
LM: Maximum limit
U: the reported uncertainty is the expanded uncertainty calculated using a coverage factor equal to 2 which gives a reliability of approximately 95%. For microbiological detections it is reported either the lower and the upper bounds of the confidence interval with a probability of 95% K=2 or the confidence interval itself. Please note that results expressed as '<LQ' may not indicate the absence of the searched parameters in the sample.
Results coming from microbiological tests are calculated according to the Standard ISO 7218:2007/Amd 1:2013. If the results are reported as <4 (CFU/ml) or <40 (CFU/g), this means that the microorganisms are present in the sample but in amounts less than 4 CFU/ml or 40 CFU/g respectively. unless differently reported in the single methods, in case of analytical steps foreseen in non-activity days of the laboratory, provisions from the standard ISO 7218: 2007/Amd.12013 (items 11.2 and 10.2.5) or from specific test methods are applied. In the case of quantitative microbiological tests, these have been set up on a single plate in accordance with ISO 7218:2007/Amd.1 2013 par. 10.2.2 unless otherwise explicitly required by current regulations.
LQ: Quantification Limit. It is the lowest analyte concentration which can be detected at an acceptable precision (repeatability) and accuracy, under well defined conditions.
LD: Detection Limit. It is the lowest analyte concentration which can be detected but not necessarily quantified, under well defined conditions.
Conformity evaluation: values not complying with laws, decrees, national and EU regulations or specifications supplied by the customer are evaluated case by case, also taking into consideration the uncertainty of measure for each single test and the regulations on rounding-off of values, and pointed out when considered as non conform.
Rec %: Recovery % "+" means that the recovery has been applied to the result. The numeric results between brackets (..) after the espression <LQ are purely indicative of traces that cannot be exactly quantified.
In the case of sampling carried out by Neotron, the laboratory applies the Internal Operating Procedure code: NEOT-DIR/ 006/53.
The laboratory disclaims any responsibility for the information provided by the client reported in this Report which may influence the validity of the results.
Methods marked with an asterisk (*) are not accredited by ACCREDIA (UNI CEI EN ISO/IEC 17025). The sampling activity is not included within the Scope of Accreditation of Neotron SPA

TEST REPORT VALID FOR ALL LEGAL PURPOSES (Italian R.D. 1-3-1928 n°842 (article 16), – Italian Law 19-7-1957 n°679 articles 16 and 18, Italian Ministerial Decree 25-3-1986).
DATA and SAMPLE STORAGE: Test Reports, Raw data, chromatographic paths and instrumental reports are stored for 5 years. One control sample is stored for 2 months.
Data expressed in this test report refer only to the sample tested in the laboratory. The results reported in this Test Report refer to the sample as received. The description or any other reference concerning the sample are declared by the customer. This Test Report cannot be reproduced except in full. Partial reproductions must be authorized in writing by our laboratory.

LABORATORY MANAGER: DR. ALBERTO GATTI -
Approved by Analysis Manager - laboratory LMAA-Nut
Approved by Analysis Manager - laboratory GC-MICRO
Approved by Analysis Manager - laboratory PCK

NEOTRON SpA - With Sole Shareholder
Stradello Aggazzotti, 104
41126 MODENA - ITALY - Fiscal Code and VAT n° 03807840362
Tel: +39 059461711 - Fax: +39 059461777
www.neotron.it - neotron@neotron.it