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To: SCP Papier, a.s.

PRODUCT SAFETY STATEMENT

Product Name(s) MetsäBoard Pro FSB Cup 1PE/2PE

Production Site(s) Metsä Board Husum Sweden (Paperboard), Metsä Board Husum Sweden

(Extrusion coating), Mondi Örebro Sweden (Extrusion coating), Walki Garstang UK (Extrusion coating), Walki Steinfurt Germany (Extrusion coating), Walki

Wroclaw Poland (Extrusion coating)

Product Description Polyethylene (PE) coated paperboard. The PE layer is applied to one or both

sides of the paperboard. PE extrusion coated paperboard is intended for food

contact applications, especially cupstock applications and similar.

The content of this statement is valid for the Metsä Board trade name(s) mentioned above.

Metsä Board is a leading European producer of folding boxboards and white linerboards. All our paperboards are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Products are manufactured in Metsä Board production sites in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001 and ISO/FSSC 22000.

FOOD CONTACT

Declaration of Compliance

We hereby state that this product is in compliance with the following global food contact laws and regulations. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations, taking also into consideration the declarations of compliance provided by our raw materials and additives suppliers and additional information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

Extrusion coated paperboard

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Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food

Complies when applicable and under foreseeable conditions of use

Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

Complies when applicable and under foreseeable conditions of use

European Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food

The PE coated paperboard is suitable to be used for all kind of food types:

 Up to temperature of max. 100 °C (212 °F) / up to 15 minutes followed by any time at room temperature



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	 Or up to temperature of max 70 °C (158 °F) / up to 2 hours followed by any time at room temperature Or any condition that can be regarded as less severe The extrusion coated paperboard may only be in contact with food on the PE coated side
Germany:	
BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact	Both dry and non-fatty foods as well as moist and fatty foods
USA:	
The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and 176.180 ("Components of paper and paperboard in contact with dry food")	All food types under FDA's Conditions of Use C ("Hot filled or pasteurized above 150 °F") through H ("Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use")
China:	
GB 9685-2016 Hygienic Standards for Uses of Additives in food containers and packaging materials	All additives used in the manufacture of the product are listed in GB9685-2016 or subsequent MOH Announcements for the appropriate use
GB 4806.8-2016 Food-Contact Use Paper and Paperboard Materials and Articles	Complies when applicable and under foreseeable conditions of use
GB 4806.1-2016 General Safety Requirements for Food-contact Materials and Articles	Complies when applicable and under foreseeable conditions of use

Paperboard

EU:	
Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Germany:	
BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact	Both dry and non-fatty foods as well as moist and fatty foods
Italy:	

Metsä Board Corporation





conditions of use

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Composition requirements for paper and cardboard intended for food products D.M. 21/3/1973

Both dry and non-fatty foods as well as moist and fatty foods

USA:

The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and 176.180 ("Components of paper and paperboard in contact with dry food")

All food types under FDA's Conditions of Use A ("High temperature heat-sterilized (e.g., over 212°F)") through H ("Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use")

All additives used in the manufacture of the product

are listed in GB9685-2016 or subsequent MOH

China:

GB 9685-2016 Hygienic Standards for Uses of Additives in food containers and packaging materials

Paperboard Materials and Articles

materials

Announcements for the appropriate use

GB 4806.8-2016 Food-Contact Use Paper and

Complies when applicable and under foreseeable

GB 4806.1-2016 General Safety Requirements for Food-contact Materials and Articles

Complies when applicable and under foreseeable conditions of use

Plastic layer

EU:

Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food

Complies when applicable and under foreseeable conditions of use

Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food

Complies when applicable and under foreseeable conditions of use

Regulation (EC) No. 10/2011 on plastic materials and articles intended to come into contact with food

Complies when applicable and under foreseeable conditions of use

No dual use additives according to (EC) No. 19/2004 are used in the plastics layer

Substances used in the board PE-extrusion coating are not regulated with specific migration limits (SML)

Germany:

BfR (Bundesinstitut für Risikobewertung) III. Polyethylene

Complies when applicable and under foreseeable conditions of use

USA:

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The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 177.1520(c), paragraph 2.1 ("Olefin polymers")

Polyethylene complies for use in articles that contact food except for articles used for packing or holding food during cooking

China:

GB 9685-2016 Hygienic Standards for Uses of Additives in food containers and packaging materials

All additives used in the manufacture of the product are listed in GB9685-2016 or subsequent MOH Announcements for the appropriate use

GB 4806.1-2016 General Safety Requirements for Food-contact Materials and Articles

Complies when applicable and under foreseeable conditions of use

OVERALL MIGRATION

Overall migration testing requirements do not apply to plastic layers in multi-material multi-layer materials and articles according to Article 14(4) of Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.

However, as a responsible food contact material manufacturer, Metsä Board has conducted voluntary migration testing for PE (polyethylene) coated paperboards to ensure the safety of the produced material.

Overall migration of the PE coated side(s) of the paperboard has been tested by an independent, third party, accredited laboratory in accordance with methods EN 1186-1 and EN 1186-5 (Materials and articles in contact with foodstuff). Overall migration is below the 10 mg/dm² limit in all tested conditions mentioned in the table below. In the evaluation, it is assumed that 1 kg of food is in contact with 6 dm² of the PE coated side(s) of the paperboard.

Simulant	Time / Temp
95% ethanol	10 days / 40 °C (104 °F)
3% acetic acid	10 days / 40 °C (104 °F)
iso-octane	2 days / 20 °C (68 °F)

NON-USE WARRANTY PE

We hereby warrant that Metsä Board does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

1.	Recycled material	This product is manufactured from virgin materials and does not contain any recycled materials.
2.	Chlorine	Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF and BCTMP process is TCF.



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3.	Fluorine	According to third-party accredited laboratory testing, fluorine has not been detected in the product (detection limit 0.05 $\mu g/dm^2$).
		Fluorinated chemicals, such as perfluorinated chemicals (PFCs) including perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid and its derivatives (PFOS), are not used in the manufacturing of the product.
		The following three specific perfluoroalkyl ethyl containing food-contact substances have not been used in the manufacturing of the product as listed in the rule 81 FR 5 by the Food and Drug Administration on 01/04/2016: 1. Diethanolamine salts of mono- and bis (1H, 1H, 2H, 2H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solids basis
		2. Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl)thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2) 3. Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis[([gamma], [omega]-perfluoro C4-20 alkylthio) methyl]-1,3-propanediol, polyphosphoric acid and ammonium hydroxide
4.	Heavy metals	No heavy metals are intentionally added during the manufacturing process. • Heavy metal traces are under the limits regulated in Finnish legislation 268/1992 Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in • Directive 94/62/EC on Packaging and Packaging Waste and its amendments.
		CONEG: The Model Toxics in Packaging Legislation
5.	ResAP (2002) 1	This product complies with the restriction limits set forth in Tables 1 and 2 of Council of Europe Resolution ResAP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs.
6.	Genetically modified organisms (GMO)	No GMO raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.
7.	Animal origin, Halal, Kosher	Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.
8.	Conflict minerals	Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product.
		We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
9.	POP Regulation and brominated flame retardants	Substances listed in the Regulation (EC) No 850/2004 on persistent organic pollutants "POPs", including polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs) as listed in EU Regulation 757/2010 amending Regulation (EC) No 850/2004 of the European Parliament and of the Council on persistent organic pollutants (POPs) as regards Annexes I and III.





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10. RoHS 2	Directive 2011/65/EU (RoHS 2 Annex II) on the restrictions of the use of certain brominated flame retardants, heavy metals and phthalates in electrical and electronic equipment.
11. California Proposition 65	Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
12. Endocrine disrupting chemicals (EDC)	Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 25.10.2018)
13. Ozone depleting substances	Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer. Substances listed in Montreal Protocol 1987.
14. UNEP 12 Chemicals, Persistent organic pollutants	Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment Programme 1997 and Regulation (EC) 850/2004.
15. Epoxy derivatives	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
16. Other substances of concern	Anthraquinone Asbestos Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenol A and Bisphenol-A DiGlycidyl Ether (BADGE) Bisphenol F and Bisphenol-F DiGlycidyl Ether (BFDGE) Bisphenol S Butylated hydroxyanisole (BHA) Butylated hydroxytoluene (BHT) Colophony Creosote Fragrances Isopropylthioxanthone (ITX) Melamine Natural rubber latex materials Nonylphenols and nonylphenol ethoxylates, TNPP Novolac glycidyl ethers (NOGE) Polyvinylchloride (PVC) Triclosan

INDUSTRY GUIDELINES AND POLICIES

Metsä Board complies with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019, formally called "Industry Guideline" whose first publication dates back to 2010, under the



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aegis of CEPI and CITPA, and first revision to 2012. The guideline is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association), ACE (beverage cartons alliance), CCB (Cepi containerboard), FEFCO (corrugated packaging) and ETS (tissue paper association).

REACH

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used.

This product complies with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

According to REACH Regulation chemical suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on this information this product does not contain Substances of Very High Concern above the reporting limit of 0,1%. Additionally, no SVHC's have been detected in control tests conducted in a third party laboratory.

ALLERGENS

We hereby warrant that 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 this product. This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs.

However, one of the raw materials may contain traces of wheat or barley. According to our risk assessment and analysis, the gluten content of the final product does not exceed 20 mg/kg. Gluten free labelling for food can be used if the gluten content does not exceed 20 ppm (= 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".

BIOCIDAL PRODUCTS

According to Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, this product is not defined as a treated article.

Biocides are used in the manufacturing process of this product to prevent harmful microbiological growth and to ensure the microbiological purity of the final product. No surface biocides are used and the transfer of antimicrobial constituents from the final product is tested in a third party laboratory to ensure no antimicrobial effect.



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NANOMATERIALS

We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paperboard production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

TOYS

This product complies with Directive 2009/48/EC on the safety of toys Annex II, Part III, point 13 migration limits for scraped-off toy materials.

This product complies with the restrictions for Phthalates, Benzene and Azocolorants/Azodyes concerning toys set forth in REACH Regulation (EC) 1907/2006 Annex XVII on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. For additional information regarding REACH Regulation please refer to the REACH section of this document.

This product does not qualify as consumer or children's product according to Consumer Product Safety Improvement Act of 2008 (CPSIA). However, with regards that heavy metal limits apply to the surface coatings and substrates of children's toys intended for children 13 and under, as set forth in Toy Safety Standard ASTM F963, based on the compliance with Directive 2009/48/EC the heavy metal content of this product is well below the limits set by CPSIA. Same applies to phthalate content of the products concerning the limits set forth in CPSIA. This product does not contain lead or phthalates above applicable thresholds (100 ppm for lead, 1,000 ppm for certain phthalates).

RISK MANAGEMENT

Metsä Board products are manufactured from fresh fibres and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils. Metsä Board evaluates all used raw materials and conducts internal risk assessment based on the supplier information.

All products are regularly tested by independent third party laboratories for food contact suitability and for globally recognized substances of very high concern, such as heavy metals. Routine and more specialised analyses are done in an internal research centre, where also new testing methods are developed. Toxicological tests have also been conducted by a third party laboratory and no genotoxicity of Metsä Board paperboards has been observed.

Metsä Board performs worst case migration calculations for all products and conducts testing as necessary. For example for PE coated paperboards migration testing is conducted according to Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food even though it is not mandatory for the final multi-material multi-layer materials and articles.

As paperboard has no harmonised measures for food contact testing in the EU, Metsä Board has additionally tested its paperboards for suitability for high temperature applications according to the Regulation (EU) No 10/2011. Based on the worst case calculations and test results, the migration of substances into food in applicable conditions is below the legal or recommended limit values for all Metsä Board paperboard products. Therefore the cumulative daily intake can also be estimated to be on an acceptable level.

Metsä Board systematically follows relevant global product safety concerns and reacts accordingly. Our personnel attends trainings regularly in order to maintain up-to-date knowledge on possible safety risks. Metsä Board follows the standardised risk management principles and has certified food management system ISO 22000.



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MATERIAL CIRCULATION

PACKAGING AND PACKAGING WASTE (EU)

We hereby warrant that this product is in compliance with the requirements of Directive 94/62/EC and its amendment 2004/12/EC.

PACKAGING AND PACKAGING WASTE (USA)

We hereby warrant that this product is in compliance with the requirements of CONEG (The Model Toxics in Packaging Legislation).

ackaging Legislation).	
REQUIREMENTS FOR PACKAGING AND PAC	KAGING WASTE (EU & USA)
EN 13427 Requirements for the use of	The procedures and record keeping enabling this declaration
	are part of Metsä Board's ISO 9001 and ISO 14001
and packaging waste	management systems.
ISO 18601 General requirements for the use	
of ISO standards in the field of packaging	
and the environment	
EN 13428 Requirements specific to	During past few years Metsä Board has been able to reduce
manufacturing and composition. Prevention by source reduction	the weight of its products without compromising the
by Source reduction	important strength performance characteristics of the packaging. Reduction of the material weight is an important
ISO 18602 Optimization of the packaging	step towards the minimization of the packaging waste.
system	1 3 3
CR 13695-1 Requirements for measuring and	Concentrations of four named heavy metals are clearly
verifying the four heavy metals and other	below the regulated limits.
dangerous substances present in packaging and their release into the environment – Part	
1: Requirements for measuring and verifying	
the four heavy metals present in packaging	
CONEG Certification / The Model Toxics in	
Packaging Legislation (USA)	Concentration of substances classified as hazardous is
CEN/TR 13695-2 Requirements for measuring and verifying the four heavy	much less than 1 % of the product weight. Substances and
metals and other dangerous substances	mixtures classified as very* hazardous have not been used
present in packaging and their release into	as raw materials in this product.
the environment. Part 2: Requirements for	·
measuring and verifying dangerous	*Very hazardous means the following classes of the Global
substances present in packaging, and their release into the environment.	Harmonized System (GHS): Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2),
release into the environment.	Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic
ISO 18602 Optimization of the packaging	environment (Acute 1 or Chronic 1) and Hazardous to ozone layer
system	Cat. 1.
EN 13429 Reuse	Not applicable. Packaging made of this product is not
	foreseen to be refilled or used for the same purpose for
EN 13430 Requirements for packaging	which it was conceived. This product has been manufactured using fresh fibres and
recoverable by material recycling	chemicals which are compatible with known, relevant and
	industrially available paper recycling technologies in the EU.
ISO 18604 Material recycling	, , , , , , , , , , , , , , , , , , , ,

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EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value

This product is suitable for energy recovery, as it is composed of much more than 50 % of organic content.

ISO 18605 Energy recovery

EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging

This product is not compostable according to standards.

ISO 18606 Organic recycling

ASTM D 6868-11 Standard Specification for Labeling of End Items that Incorporate Plastics and Polymers as Coatings or Additives with Paper and Other Substrates Designed to be Aerobically Composted in Municipal or Industrial Facilities

RECYCLABILITY (USA)

This product is recyclable in less than 60 % of the communities in the United States. Currently, access to recycling facilities on a national basis for bleached paperboard is approximately 50 %, and 55 % for coated liquid cartons. The U.S. Federal Trade Commission restricts claims of recyclability if recycling of a given material is not available to a "substantial majority of consumers or communities," which means at least 60% of consumers or communities have access to recycling.

This product is capable of being recycled, whether as part of an industrial recycling program or curbside recycling available to consumers. The U.S. Federal Trade Commission, however, restricts claims of recyclability if recycling of a given material is not available to a "substantial majority of consumers or communities," which means at least 60% of consumers or communities have access to recycling. Currently, 73% and 50% of U.S. communities have access to recycling programs for unbleached and bleached paperboard, respectively, that rate can vary by a variety of factors. Thus, recycling facilities for our bleached paperboard may not exist in your area.

Accordingly, Metsä Board recyclability claims are limited to the Metsä Board products, and do not apply to any final package made from them. We recommend that our customers ensure they have adequate substantiation to support any claims of recyclability or other environmental performance with respect to their specific packaging configuration.

DISCLAIMER

The information provided in this statement applies only for the paperboard, barrier coated paperboard or pulp material as delivered by Metsä Board Corporation and may not substitute necessary end use testing. Metsä Board Corporation shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use.

The information given in this statement has been verified by Metsä Board Corporation at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available.





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METSÄ BOARD CORPORATION

For any queries or questions regarding the statements presented herein, please contact: sustainability.metsaboard@metsagroup.com