

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

18 August 2022

Dr. Dr/Ze-gu

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITEeingetragen  
registered no.  
ré registré

57737 U 22

für  
for  
pourMondi Stambolijski EAD  
1, Zavodska Str.  
4210 Stambolijski  
BulgariaProdukt  
Product  
ProduitAdvantage Kraft  
Advantage MF Kraft  
Advantage Semi Extensible  
Advantage MF Semi Extensible  
Advantage Kraft Wet Strength  
Advantage Semi Extensible Wet Strength

The products manufactured by the company mentioned above are unbleached paper grades in various grammages, which are used for food packaging.

They were examined by us in 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 26.02.2015,

(BfR-“Collection of methods for the examination of paper and board for food contact” of the, current state), in connection with the BfR guideline “Examination of the transfer of substances from consumer products made of paper and board”, as of 26.02.2015),

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as well as according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (29 March 2022 edition),  
§ 176.170,

for the used raw materials, fabrication additives and special paper finishing agents as well as  
for the release of substances which might endanger health.

Moreover, a determination of the heavy metals contents in line with the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994,  
on packaging and packaging waste, Official Journal of the European Communities L 365/10  
of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European  
Parliament and of the Council of 30 May 2018, Official Journal of the European Union  
L 150/141 of 14 June 2018,

was performed.

The paper 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 Direc-  
tives 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,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futter-  
mittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021  
(BGBl. I S. 4253), zuletzt geändert durch Artikel 7 des Gesetzes vom 27. September 2021  
(BGBl. I S. 4530), §§ 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), last  
amendment by article 7 of the law of 27 September 2021 (BGBl. I p. 4530), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-  
gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch  
225. Mitteilung, Bundesgesundheitsblatt 65 (2022) 525-526, Stand vom 01.04.2022,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> An-  
nouncement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 225<sup>th</sup> Announcement,  
Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022).

The marketability in Italy is given by means of the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973,  
Art. 38-bis, last modification of 31 May 2016.

Furthermore, they are in conformity with the provisions of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (29 March 2022 edition),  
§§ 176.170 and 176.180.

In addition, the paper grades observe the requirements of the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994,  
on packaging and packaging waste, Official Journal of the European Communities L 365/10  
of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European  
Parliament and of the Council of 30 May 2018, Official Journal of the European Union  
L 150/141 of 14 June 2018,

with regard to the content of heavy metals.

Thus, the unbleached paper grades **Advantage Kraft**, **Advantage MF Kraft**, **Advantage Semi Extensible**, **Advantage MF Semi Extensible**, **Advantage Kraft Wet Strength** and **Advantage Semi Extensible Wet Strength** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, moist and fatty foods.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



**staatlich anerkannter Sachverständiger**  
■ Untersuchung der Gegenproben von  
Verpackungsmaterial aus Papier, Pappe,  
Kunststoffen, Glas, Weißblech und  
sonstigen Materialverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit

(Dr. Zechmann)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**Staatl. 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 Aschaffenburg Chamber of Industry and Commerce.

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



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, asservementé par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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.

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