

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

2 August 2022

Dr. Dr/Ils-kr

**UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE**eingetragen  
registered no.  
registré

57597 U 22

für  
for  
pourHolmen Paper AB  
60188 Norrköping  
SwedenProdukt  
Product  
Produit

Holmen INNR

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us under 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),

as well as of the Council of Europe's

Technical guide on paper and board used in food contact materials and articles, as of 2021, for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, it was examined according to 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,

and to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

for the heavy metal contents.

The paper grade is 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 Directives 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, 1. (a) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - 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 is 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> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 225<sup>th</sup> Announcement, Bundesgesundheitsblatt 65 (2022) 525-526, as of 1 April 2022).

The demands of the

Council of Europe Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food of 7 October 2020, sections 3.1 and 3.3,

as well as of the supplementary

Technical guide on paper and board used in food contact materials and articles, as of 2021,  
are met by the paper grade.

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) 2015/720 of the European  
Parliament and of the Council of 29 April 2015, Official Journal of the European Union  
L 115/11 of 6 May 2015,

as well as to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of De-  
cember 14, 1989, last modification of December 2008,

are met by the paper grade regarding the heavy metal content.

Thus the paper grade **Holmen INNR** according to the sample material submitted may be used  
safely for food packaging. It may stand in direct contact with dry, moist and fatty foodstuffs.

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

Certification decision



Öffentlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Papp,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
Lebensmittelrechtliche Unbedenklichkeit.

(Burkardt)  
Officially certified  
and authorized food  
chemist



**Staatlich 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, assermenté 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.



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

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A file sample of the tested material is kept at the expert's office.  
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