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Öffentlich bestellter und vereidigter Sachverständiger für  
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31 October 2023  
Dr. Dr/Ze-bau

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
réglisé

60674 U 23

für  
for  
pour

Mondi Frantschach GmbH  
Frantschach 5  
9413 St. Gertraud  
Austria

Produkt  
Product  
Produit

Advantage Kraft Plus  
Advantage MF Kraft Plus  
Advantage Semi Extensible  
Advantage Semi Extensible Plus  
Advantage High Strength  
Advantage High Strength Plus

The products manufactured by the company mentioned above are brown paper grades in different 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),

as well as of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2023 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, an analysis in line with the

DGCCRF - Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(DGCCRF - MCDA Blatt Nr. 4 (V02 - 01/01/2019) Food contact suitability of plant fibre-based organic materials intended to come into contact with food),

was carried out.

Additionally, a sensory test was performed.

Besides, they were tested for the content of heavy metals 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,

as well as according to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified February 2021.

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 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,

as well as the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBI. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 2 Absatz 6 des Gesetzes vom 20. Dezember 2022 (BGBI. I S. 2752), §§ 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 (BGBI I. p. 4253; 2022 I p.28), last amended by article 2 paragraph 6 of the act of 20 December 2022 (BGBI. I p. 2752), §§ 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 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> An-nouncement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

The marketability in Italy is given by the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973,  
Art. 38-bis, last amended on 25 November 2022.

Moreover, they conform to the French

Décret n° 2007-766 du 10 mai 2007 portant application du code de la consommation en ce qui concerne les matériaux et les objets destinés à entrer en contact avec les denrées alimentaires, Journal officiel de la République française n° 0109 du 11 mai 2007, modifié en dernier lieu par décret n° 2011-385 du 11 avril 2011, Journal officiel de la République française n° 0087 du 13 avril 2011,

(Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer code, which concerns materials and articles intended to come into contact with food, Official Journal of the French Republic no. 0109 of 11 May 2007, last modified by Decree no. 2011-385 of 11 April 2011, Official Journal of the French Republic no. 0087 of 13 April 2011),

and fulfil the requirements of the

DGCCRF - Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(DGCCRF - MCDA Blatt Nr. 4 (V02 - 01/01/2019) Food contact suitability of plant fibre-based organic materials intended to come into contact with food).

Furthermore the paper grades are in compliance to the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2023 edition),  
§§ 176.170 and 176.180.

Regarding the content of heavy metals, they furthermore observe 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,

as well as the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified February 2021.

Thus the brown paper grades **Advantage Kraft Plus, Advantage MF Kraft Plus, Advantage Semi Extensible, Advantage Semi Extensible Plus, Advantage High Strength and Advantage High Strength Plus** in different grammages 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 5 pages.

Certification decision



staatlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit

(Dr. Zechmann)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 5.  
La traduction des estampilles est donnée en page 5.



**Staatslich 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 Chamber of Industry and Commerce.

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



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.

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.

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

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

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.