

Dr. Ralph Derra

Öffentlich bestellter und vereidigter Sachverständiger für
Verpackungsmaterialien, Boden- und Luftanalysen;
Sachverständiger in der Wasseranalytik

17 June 2025

Dr. Dr/Kö-pf

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen
registered no.
registré

64887 U 25

für
for
pour

Mercer Rosenthal GmbH
Hauptstraße 16
07366 Rosenthal am Rennsteig
Germany

Produkt
Product
Produit

Mercer Rosenthal Kraft ECF

The product manufactured by the company mentioned above is a pulp grade which is used for the manufacture of papers and boards for food packaging, of cooking and hot filter papers, of baking papers and boards as well as of papers for tobacco products.

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 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact", current status, in connection with the BfR guideline "Testing of substance transfers from consumer articles made of paper, cardboard and paperboard", as of 28 September 2023),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2025 edition), § 176.170,

for the used raw materials and fabrication additives as well as for the release of substances which might endanger health.

The pulp 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 Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 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; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and conforms to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025),

as well as to the

BfR-Empfehlung XXXVI/1. Koch- und Heißfilterpapiere und Filterschichten, neugefasst durch 200. Mitteilung, Bundesgesundheitsblatt 42 (1999) 817, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI/1. Cooking Papers, Hot Filter Papers and Filter Layers, recasted by 200th Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025),

and to the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181st Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025),

as well as to the

BfR-Empfehlung XXXVI/3. Saugeinlagen auf Basis von Cellulosefasern für die Verpackung von Lebensmitteln, 205. Mitteilung, Bundesgesundheitsblatt 45 (2002) 936, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025,

(BfR Recommendation XXXVI/3. Absorber Pads based on Cellulosic Fibres for Food Packaging, 205th Announcement, Bundesgesundheitsblatt 45 (2002) 936, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025).

Moreover, it meets the applicable provisions of the Swiss

SR 817.0 Bundesgesetz über Lebensmittel und Gebrauchsgegenstände (Lebensmittelgesetz – LMG) vom 20. Juni 2014 (AS 2017 249), Stand am 1. Oktober 2024 (AS 2024 457), Artikel 15,

(SR 817.0 Federal Act on Foodstuffs and Utility Articles (Foodstuffs Act, FSA) of 20 June 2014 (AS 2017 249), state of 1 October 2024 (AS 2024 457), article 15),

as well as of the

SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) vom 16. Dezember 2016 (AS 2017 283), Stand am 1. Juli 2025 (AS 2025 369), Artikel 49,

(SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (AS 2017 283), state of 1 July 2025 (AS 2025 369), article 49),

and the

SR 817.023.21 Verordnung des EDI über Materialien und Gegenstände, die dazu bestimmt sind, mit Lebensmitteln in Berührung zu kommen (Bedarfsgegenständeverordnung) vom 16. Dezember 2016 (AS 2017 1537), Stand am 1. Juli 2025 (AS 2025 395), Artikel 27,

(SR 817.023.21 Ordinance of the FDHA on materials and articles intended for food contact (Materials and Articles Ordinance) of 16 December 2016 (AS 2017 1537), state of 1 July 2025 (AS 2025 395), article 27).

Furthermore, the pulp grade is in compliance with the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2025 edition), §§ 176.170 and 176.180.

Papers and boards manufactured with it can meet the requirements of the

Reglamento Técnico Mercosur sobre materiales, envases y equipamientos celulósicos destinados a estar en contacto con alimentos, Mercosur/GMC/Res. No. 40/15,

and of the

Reglamento Técnico Mercosur sobre materiales celulósicos para cocción y filtración en caliente, Mercosur/GMC/Res. No. 41/15,

as well as of the

Reglamento Técnico Mercosur sobre materiales, envases y equipamientos celulósicos destinados a estar en contacto con alimentos durante la cocción o calentamiento en horno, Mercosur/GMC/Res. No. 42/15,

and of the

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

as far as the pulp grade mentioned above is concerned.

Thus the pulp grade **Mercer Rosenthal Kraft ECF** according to the sample material submitted may be used safely for the manufacture of papers and boards for food packaging, of cooking and hot filter papers as well as of baking papers and boards. The finished products manufactured with it may stand in direct contact with dry, moist and fatty food as far as the pulp grade mentioned above is concerned.

Furthermore, the use for the fabrication of papers for tobacco products is approved. Papers manufactured with it are in compliance with the demands of the

Gesetzes über Tabakerzeugnisse und verwandte Erzeugnisse (Tabakerzeugnisgesetz – TabakerzG) vom 4. April 2016 (BGBl. I S 569), zuletzt geändert durch Artikel 3 des Gesetzes vom 8. Dezember 2024 (BGBl. 2024 I Nr. 405), § 5,

(Act on tobacco products and related products of 4 April 2016 (BGBl. I p. 569), last amended by article 3 of the act of 8 December 2024 (BGBl. 2024 I no. 405), § 5),

as well as of the

Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse (Tabakerzeugnisverordnung – TabakerzV) vom 27. April 2016 (BGBl. I S. 980), zuletzt geändert durch Artikel 1 der Verordnung vom 24. Juli 2023 (BGBl. 2023 I Nr. 196), § 4,

(Ordinance on tobacco products and related products of 27 April 2016 (BGBl. I p. 980), last amended by article 1 of the ordinance of 24 July 2023 (BGBl. 2023 I no. 196), § 4),

and may be used as intended, as far as the pulp grade is concerned.

This certificate of compliance has a validity of 2 years and consists of 6 pages.
It was subsequently amended on 24 October 2025.

Certification decision



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

(Höfer)
Officially certified
and authorized food
chemist



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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.

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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