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Sachverständiger in der Wasseranalytik

25 May 2023

Dr. Dr/lb-pf/ci

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

59578 U 23

für
for
pourMercer Rosenthal GmbH
Hauptstraße 16
07366 Rosenthal am Rennsteig
GermanyProdukt
Product
Produit

MERCER Rosenthal Kraft ECF & TCF

The products manufactured by the company mentioned above are pulp grades which are 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.

They were 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),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (May 12, 2023 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 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, 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 2 Absatz 6 des Gesetzes vom 20. Dezember 2022 (BGBl. 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 (BGBl. I. p. 4253; 2022 I p.28), last amended by article 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst 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 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023),

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 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI/1. Cooking Papers, Hot Filter Papers and Filter Layers, recasted by 200th Announcement, Bundesgesundheitsblatt 42 (1999) 817, last amended by 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023),

and to the

BfR-Empfehlung XXXVI/2. Papiere, Kartons und Pappen für Backzwecke, 181. Mitteilung, Bundesgesundheitsblatt 32 (1989) 80, zuletzt geändert durch 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR-Recommendation XXXVI/2. Paper and Paperboard for Baking Purposes, 181st Announcement, Bundesgesundheitsblatt 32 (1989) 80, last amended by 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023),

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 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021, einschließlich 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217,

(BfR Recommendation XXXVI/3. Absorber Pads based on Cellulosic Fibres for Food Packaging, 205th Announcement, Bundesgesundheitsblatt 45 (2002) 936, last amended by 223rd Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021, including 226th Announcement, Bundesgesundheitsblatt 66 (2023) 216-217).

Furthermore, the pulp grades are in compliance with the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (May 12, 2023 edition), §§ 176.170 and 176.180.

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

Moreover, the use of **MERCER Rosenthal Kraft ECF & TCF** for the fabrication of papers for tobacco products is approved. Papers manufactured with them 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 2 Absatz 5 des Gesetzes vom 20. Dezember 2022 (BGBl. I S. 2752), § 5,

(Act on tobacco and related products of 4 April 2016 (BGBl. I p. 569), last amended by article 2 paragraph 5 of the act of 20 December 2022 (BGBl. I p. 2752), § 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 4 des Gesetzes vom 23. Oktober 2020 (BGBl. I S. 2229), § 4,

(Ordinance on tobacco and related products of 27 April 2016 (BGBl. I p. 980), last amended by article 4 of the act of 23 October 2020 (BGBl. I p. 2229), § 4),

and may be used as intended, as far as the pulp grades are concerned.

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

(Höfert)
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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