

Declaration of Compliance

Trade Name	WHITE TOP TESTLINER (WTTL)
Grammage	Ranges between 120 g/m ² and 175 g/m ² (For more information see technical specification)
Fiber Source	Recycled fibers
Production Sites	Söke/AYDIN
Producer	Batı Kipaş Kağıt San. Ve Tic. A.Ş.

Structure

_____	Top Layer (WL+SOP+Coating Starch) → 40-50 % Avg.
_____	Under Layer (OCC+ONP) → 50-60 % Avg.

* Calculations are for 120 g/m²

1. Instructions For Safe and Appropriate Use

The paperboard complies under foreseeable conditions of use with Regulation (EC) No 1935/2004 (state of June 18, 2009) on materials and articles intended to come into contact with food.

When converting these paperboards each part of the converting chain is responsible for the suitability for the intended end-use.

The properties of the cardboard can change as a result of processing. The conformity only refers to the delivered condition, which is respecting specific Technical Data Sheets and the fulfilling the GMP applied in our mills, as requested by (EC) No 2023/2006.

When packing dry foodstuffs with large surface is recommended an appropriate intermediate packaging, if migration via the gas phase onto the food is to be expected.

The information contained in this certificate is carried out as well as on analyses performed on representative board samples.

This recycled board grade is intended for packaging food, for secondary packaging and packaging applications involving direct contact with dry, non-fatty foodstuffs and such kind of foodstuff which are peeled, shelled or washed before consumption according to the BfR Recommendation XXXVI.

The information given in this certificate is based upon written confirmation from our chemical suppliers as well as analysis performed on representative paper samples.

2. Compliance with European Food Contact Legislation

All our grades are manufactured mainly from recycled fibers and only food contact approved chemical additives are used as rawmaterial in the production of paperboard. The pulp and paper manufacturing process conforms to established technology and is in compliance with GMP.

The paperboard complies under foreseeable conditions of use with:

- Regulation (EC) No 1935/2004 (state of June 18, 2009) on materials and articles intended to come into contact with food.
- (EC) No 2023/2006 (state of December 22, 2006) on good manufacturing practice for materials and articles intended to come into contact with food.



- BfR Recommendation XXXVI (state of February 1, 2023), Paper and board with limitations mentioned in Instructions for safe and appropriate use.
- 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 », as far as it is used as secondary packaging with an appropriate intermediate packaging.
- CEPI Food contact guidelines for the compliance of paper and board materials and articles (state of February 26, 2021)

3. Analyses

- Compliance with BfR Recommendation XXXVI (state of April 1, 2022) and French Fiche MCDA n°4 (state of January 1, 2019): The paperboard complies with the requirements in BfR Recommendation XXXVI, Paper and Board and Fiche MCDA n°4.
- CONEG (Toxic Elements Analysis)
AS PER 94/62/EC & 2004/12/EEC Directive on Packaging and Waste; Acid Digestion Method was used and Total Toxic Elements and Hexavalent Chromium Content were determined by Inductively Coupled Plasma Optical Emission Spectrometer & UV-VIS Spectrophotometry
Heavy metals; Lead (Pb), Cadmium (Cd), Mercury (Hg), Chromium +VI (CrVI) not detected.

Analyses have been performed on representative samples of paperboard.

4. Recyclability & Biodegradability

- Recyclability – EN 13430

The EN 13430 defines the possibilities of materials recycling. A package must be designed in such a way that the raw materials used can be recycled by means of commonly used sorting systems or standard materials recovery systems. Packages that consist of several materials must be constructed so the consumer can separate them. Board is simply collected as recovered paper and turned back into board in a recycling plant.

- Biodegradability – EN 13432

The EN 13432 describes requirements and processes regarding biodegradability. In addition to general biological degradability in laboratory tests, the aerobic degradability of the individual packaging materials must be proven in practice. The packaging components must not have any negative impact on the quality of the compost.

WTTL grade consists of recyclable raw materials and complies with the two standards of recyclability and biodegradability.

5. Substances

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance, or quality. Please note that we do not analyze the paperboard for all the substances listed below. Information below is based upon our information given by our chemical suppliers. **The occurrence of traces from the use of recycled fibers cannot be excluded.**

GMO

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union* are not intentionally added in the production paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination.**

* See also, "Genetically Modified Organisms (europa.eu)"

** Regulation 1830/2003 on traceability and labelling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

ANIMAL ORIGIN

We hereby confirm that no additive of animal origin is intentionally added in the production of paperboard.

FOOD ALLERGENS

Allergens listed in (EU) N° 1169/2011, which exclusively regulates food goods production and distribution, are not intentionally added in the internal composition of our paperboards. The occurrence of traces from the use of recycled fibers cannot be excluded.

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof
- Nuts and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂.
- Lupin and products thereof
- Molluscs and products thereof

Consequently the products may reasonably be expected not to contain allergenic proteins.

PHTHALATES

We hereby confirm that no phthalates are intentionally added in the production of paperboard, traces from recycling paper are possible.

BISPHENOL A and BISPHENOL S

We hereby confirm that no Bisphenol A or Bisphenol S are intentionally added in the production of paperboard, traces from recycling paper are possible.

PULP AND BLEACHING

Chlorine bleaching is not applied in our processes.

NANOMATERIALS

Nanomaterial defined as: "substances intentionally produced at nanometric scale" are not used for the production of board in the Batı Kipaş Kağıt San. ve Tic. A.Ş. (Decree no. 2012-232, application of article R. 523-4 of the Environment code)

PER- AND POLY-FLUOROALKYL SUBSTANCES (PFAS)

We hereby confirm that no polyfluorinated substances are intentionally added in the production of paperboard, traces from recycling paper are possible.

ENDOCRINE DISRUPTORS & POP

Our products do not contain substances that have undergone the full evaluation process for endocrine disruption as regulated in the EU under REACH legislation (the Candidate - and Authorization Lists).

During the production of our cardboards, none of the substances listed in the EU Regulation 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs), updated by the regulations (EU) 2022/2291 and (EU) 2022/2400, is intentionally added. These ubiquitous substances can not be totally ruled out. The substances listed have not been detected in our file for several years.

OBA

Optical brighteners are present in all recycled cartons, whether used or not. However, there is no migration via the gas phase, so that no migration takes place in dry, non-fatty foods.

MINERAL OILS

MOSH and MOAH, which are mainly coming from inks used in printing and therefore present in our raw materials, are monitored both for their content in our products and for their migration to food according to methods recognized at European level (National Reference Laboratory for Food Contact Materials at the Federal Institute for Risk Assessment - BfR Germany).

6. Additional Legislation and Regulations, Not Food Related

- Directive (EC) 2018/852 (state of May 30, 2018) amending Directive 94/62/EC on packaging and packaging waste.
- REACH Regulation (EC) 1907/2006. Reach statement available on our website www.batikipas.com.tr
 - Substances in the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration > 0.1% (w/w).
 - Substances included in Annex XVII, Restrictions, where the restriction is applicable on our use. Traces from recycled raw materials are possible.
- ROHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU
- 94/62/EC for packaging:

We hereby confirm that the paper fulfils the EN requirement for sum concentration for lead, cadmium, mercury and hexavalent chromium, which shall not exceed 100 ppm.

7. Certified Management System In Our Production Sites

Bati Kipaş Kağıt San. ve Tic. A.Ş. is certified according to the following standards;

- ISO 9001
- ISO 27001
- ISO 50001
- FSC®
- PEFC

All certificates and recognitions related to our production site are available on our website www.batikipas.com.tr

8. Storage and Handling Requirements

Temperature Difference	Δ °C	5	7	10	15	20	25	30
Time in Hours	Hour	11	13	22	32	52	77	103

Temperature Difference (°C) = Warehouse Temperature (°C) – Usage Area Temperature (°C)

Storage Conditions: It can be stored in its original packaging in covered warehouses that are protected from rain, the floor is not wet, and protected from dust and excessive sunlight. It is essential to use opened products immediately.

The packaging should not be opened until the products reach the usage area temperature.

9. Disclaimer

It is the responsibility of the manufacturer of the finished packages to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications, and limitations in the intended application. This declaration and its contents are subject to the following additional limitations and disclaimers:

- This document is valid and applicable for a proper use of the product as declared in Section 1 "Instructions for safe and appropriate use" and Section 7 "Storage and handling requirements" of this document.
- The product user is recommended to avoid any possible product misuse that could have, as a consequence, a legal infringement or risk for health or environmental impact.
Batı Kipaş Kağıt San. ve Tic. A.Ş. will not be responsible of any consequence related to a product improper use.
- Based on our risk analysis, the information set out herein is accurate to our current best knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when manufacturing the products to which the present document refers to.
- This declaration is only valid as of its date of publication and, for the avoidance of doubt, we assume no liability for subsequent changes in information, contents, processes, European regulatory requirements, European applicable legislation and rules or otherwise.
- This declaration is only valid to the extent it has been signed and delivered by an authorized responsible of the Batı Kipaş Kağıt San. ve Tic. A.Ş.
- Nothing in this declaration shall be interpreted as a warranty (direct or implied) with respect to (a) anything beyond what is expressly set out herein, (b) the merchantability or fitness for a particular purpose (other than the product's defined purpose), (c) the use, or the suitability for use, in connection with other products or materials, or (d) the safety or legality in any use, processing and handling of our products.
- This declaration forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in such delivery contract shall apply to this certificate. In the event of a discrepancy, the contract signed, the purchase order confirmed and the Batı Kipaş Kağıt San. ve Tic. A.Ş. General Terms and Conditions will prevail.
- No one other than the addressee may rely on this declaration and we assume no liability whatsoever to any third party.
- Batı Kipaş Kağıt San. ve Tic. A.Ş. will not be responsible in case of a lack of any specific additional information herein. This document has been prepared according to legal and mandatory information requirements and any further information, not required to be included by law, may be provided upon request.
- Batı Kipaş Kağıt San. ve Tic. A.Ş. will not be responsible in case of export of finished products with our materials to countries that required different and/or additional declarations to those listed in this document
- The validity of this declaration always refers to the last release available on our website (www.batikipas.com.tr)

Approved by:

ŞAKİR KOCADAYI

Quality Manager



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