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### **Declaration of Compliance**

Sappi product name: Magno Matt  
Product description: Coated fine paper

## **1. General Information**

### **Pulp composition**

Magno Matt is produced with a mixture of elementary (ECF) and totally chlorine free (TCF) bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that Magno Matt is produced without intentional addition of any recycled materials.

### **Acid content/Chloride content**

The pH of this product is above 7. The product can be described as neutral or slightly alkaline. It has not been tested for chloride content.

## **2. Food Contact Status**

### **Conditions for food contact**

This product can be used as food contact material. It can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR.

### **Compliance with (EU) No 1935/2004**

This product complies with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. This product can be applied as packaging for foodstuffs.

### **Compliance with BfR recommendation XXXVI**

This product is approved according to BfR recommendation XXXVI.



## **Compliance with Foodstuffs and Animal Feed Code (LFGB)**

This product is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

## **Compliance with FDA requirements for food packaging**

This product has not been assessed according to the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (current version), §§ 176.170 and 176.180.

## **Compliance with the Swiss Ordinance on food packaging materials**

This product fulfils the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

## **Compliance with (EC) No 2023/2006**

This product was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. Full traceability of raw materials is possible through the IT systems. The producing mill has implemented a quality management system according to ISO 9001. The quality management system is externally certified.

## **3. Toy Safety**

### **EU toy safety directive**

This product meets the requirements of Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys, including the latest amendments, for scraped-off toy materials regarding their chemical properties. It can be safely used in toys for children older than 3 years and for toys that are not intended to be placed in the mouth.

### **Toy safety EN 71/3**

This product has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71 part 3: "Migration of certain elements".

### **Toy safety EN 71/9**

This product has been tested and found to be in compliance with the demands of the Toy Safety standard EN 71 part 9 "Organic chemical compounds". The formaldehyde concentration in accordance with EN 645 and EN 1541 was confirmed to be below the limit of 30 mg/kg.

## **4. Relevant legislation**

### **Compliance with EC 1907/2006 (REACH)**

The regulation EC No 1907/2006 (REACH) primarily addresses chemical substances, mixtures and articles being placed on the market in the European Union (EU) / European Economic Area (EEA). Registration requirements under the REACH regulation apply to substances and as such they do not apply to Magno Matt being placed on the EU / EEA market by Sappi.

Any REACH registration obligations that apply to the raw materials (substances) being used in the manufacturing processes of our products are being met by our suppliers and we request confirmations from our suppliers that they have fulfilled those obligations.

To the best of our knowledge, no substance listed on either the Candidate List for Substances of Very High Concern (SVHC) nor any of those substances already listed in Annex XIV for Authorisation under REACH, are found in the products we are supplying to our customers at concentrations >0.1%. Amendments of the SVHC list up to and including January 17th 2022 have been considered.

Any information that needs to be passed down the supply chain in accordance with the provision of information requirements of the REACH regulation will be communicated to you separately where required and in the appropriate format.

### **Compliance with 94/62/EC (Packaging)**

This product is in compliance with the Directive 94/62/EC on packaging and packaging waste, including latest amendments, regarding the content of heavy metals as specified in Article 11. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

### **Compliance with Directive 2011/65/EU (RoHS)**

The substances restricted by EU-directive 2011/65/EC Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive) and its amendment Directive (EU) 2017/2102 have not intentionally been added to the manufacturing process of Magno Matt. They are not expected to be present above the maximum allowed thresholds levels.

### **Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)**

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of Magno Matt. Updates until and including December 31st 2021 have been considered.

### **Canadian Environmental Protection Act**

Substances listed in Canadian Environmental Protection Act, 1999 are not intentionally added to the manufacturing process of this product.

### **CONEG**

This product is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals CrVI, Pb, Cd, Hg is below 100 ppm.

## **5. Miscellaneous**

### **BSE/TSE risk**

Raw materials of animal origin classified as risk materials according to Directive 2000/418/EG, Annex I, are not used during the manufacture of this product. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex of 2000/6/EC and Annex I 3. of EU 722/2012 are applied.

## 6. Information on end-of-life scenarios

### Recyclability

Magno Matt is fully recyclable in the waste paper stream. The product has not been tested for its repulability properties, but to the best of our knowledge about the product composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 22 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

## 7. Non-use of specific substances or materials

### Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of this product.

### MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

### Anthraquinone

Anthraquinone (CAS 84-65-1) has not been added to the manufacturing process of Magno Matt. Its nonpresence in the raw materials is screened regularly.

### Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of this product, except for wheat starch, which in turn may contain gluten.

Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

### Glycides

The product has not been tested for the presence of glycidyl fatty acid esters as well as glycidyl silanes, such as GLYMO or GLyEO. We do not intentionally add these chemicals to the manufacturing process and they are not expected to be present in the final product.

### Persistent organic pollutants

None of the following substances listed in Annexes A, B, and C of the Stockholm Convention have been intentionally added during production of this product:

- Aldrin
- Chlordane
- Dieldrin
- DDT
- Endrin
- Heptachlor
- Hexachlorobenzene
- Mirex
- Toxaphene

- Polychlorinated biphenyls (PCBs)
- Dioxins and furans

None of the following substances listed in the amendments of Stockholm Convention Annexes A, B, and C in the COP decisions SC 4/10-4/18, SC 5/3, SC 6/13 have been intentionally added during production of this product:

- Chlordecone
- Alpha and beta hexachlorocyclohexane
- Lindane
- Hexabromobiphenyl, hexabromodiphenyl ether and heptabromodiphenyl ether
- Pentachlorobenzene
- Perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride
- Tetrabromodiphenyl and pentabromodiphenyl ethers

### **Titanium oxides**

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of the product formulation and they are not expected to be present in the product.

### **Optical brightening agents**

Optical brightening agents (OBAs) are intentionally used during the manufacture of this product. These substances are used in accordance with respective BfR recommendations and FDA legislation.

### **PVDC**

Polyvinylidene chloride (PVDC) is not added to the manufacturing process of Magno Matt.

### **Sulfur**

As far as it concerns content of sulfur species, Magno Matt is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered 'reducible sulfur species' according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of 'Reducible sulfur species' according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

### **Conflict minerals**

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of this product.

### **CMR Substances according to CLP legislation**

During the production of this product, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

### **Other substances**

None of the following substances/substance classes have been intentionally added to the manufacturing process of this product:

- Alkylphenols and their ethoxylates
- Anthraquinone (CAS 84-65-1)
- Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2 )
- Asbestos

- Azodicarbonamide (CAS 123-77-3)
- BAC (CAS 63449-41-2 )
- BADGE, BFDGE, NOGE
- Benzene (CAS 71-43-2 )
- Benzophenones
- Bis(2-ethylhexyl) adipate (DEHA, CAS 103-23-1)
- Bisphenols, including bisphenol A (CAS 80-05-7), bisphenol B (CAS 77-40-7), bisphenol C (CAS 79-97-0)
- Cadmium, lead, mercury, chromium and compounds thereof
- Chlorine and other halogens (Fluorine, Bromine, Iodine)
- Cobalt and its compounds
- Creosote
- Cyanuric acid (CAS 108-80-5 )
- DDAC (CAS 7173-51-5 )
- Diisopropylnaphtalenes (DIPNs)
- Dimethylfumarate (CAS 624-49-7)
- Disodium guanylate (CAS 5550-12-9)
- Epoxy resins
- Ethanol (CAS 64-17-5)
- Formaldehyde
- Glyphosate (CAS 107-83-6)
- Glycol ethers
- GLYMO (CAS 2530-83-8)
- Hexane (CAS 110-54-3)
- Inosinate (CAS 4691-65-0)
- Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
- Melamine (CAS 108-78-1)
- Micas
- Monosodium glutamate (CAS 142-47-2)
- Natural rubber latex materials
- N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
- Nitrosamines, Nitrites, Nitrates
- N-Methylpyrrolidone (NMP) (CAS 872-50-4)
- 4-Nonylphenol (4-NP) (CAS 3050-88-2)
- Nonylphenoxyethoxylate (NPE, CAS 127087-87-0)
- Organic Peroxides
- Organotin compounds
- Orthophenylphenol (CAS 90-43-7)
- Palm oil and derived substances
- Partially hydrogenated terphenyls (HTPs)
- Pentachlorophenol (PCP)
- Pentanedione-2,4-titanium
- Perchlorates
- Phenylalanin
- Phthalates
- Polycyclic aromatic hydrocarbons (PAHs)
- Polyvinylchloride (PVC)
- Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
- Radioactive materials, radioactive contamination
- Rice plant derived substances
- Seed-bearing parts of a flowering plant (fruits)

- Sodium Antimonate A (CAS 15432-85-6)
- Sweeteners
- TAA Titanium Acetylacetonate (CAS 17501-79-0)
- Toluene (CAS 108-88-3)
- Triclosan (CAS 3380-34-5)
- Tris(4-nonylphenyl, branched and linear) phosphite
- 2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
- Volatile Organic Compounds
- Yeast
- TNPP, 4 NP and NPE

## Flame retardants

No flame retardants have been added to the manufacturing process of this product. We can confirm non-use of the following substances commonly used as flame retardants:

- Antimony trioxide CAS (1309-64-4)
- TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
- TBB, 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
- Chlorinated paraffins CAS (108171-26-2)
- TCPP, Tris(1-chloro-2-propyl) phosphate CAS (13674-84-5)
- HBCD, Hexabromocyclododecane CAS (3194-55-6)
- TBBPA, Tetrabromobisphenol A CAS (79-94-7)
- TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
- TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
- Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
- Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
- Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

## Wet strength agents

Wet strength agents have not been added to the manufacturing process of Magno Matt.

## Disclaimer

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