

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

13 May 2016

Dr. Dr/Hh-pf

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

42409 U 16

für Firma  
for Messrs  
pour MMSUZANO BAHIA SUL PAPEL E CELULOSE S. A.  
Rua Dr. Prudente de Moraes, 4006, Areiaio  
08613-900 Suzano, SP  
BrazilProdukt  
Product  
Produit

TP Premium

The product manufactured by the company mentioned above is a board grade which is used for food packaging.

It was examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2015 edition), § 176.170,

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for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, the board grade was examined 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 2013/2/EU of the Commission of 7 February 2013, Official Journal of the European Union L 37/10 of 8 February 2013,

as well as to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

for its heavy metal contents.

The board 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, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 1 der Verordnung vom 26. Januar 2016 (BGBl. I S. 108), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 1 of the Decree of 26 January 2016 (BGBl. I p. 108), §§ 30 and 31),

and is approved according to the

Deutsche Empfehlung XXXVI zur gesundheitlichen Beurteilung von Materialien und Gegenständen für den Lebensmittelkontakt im Rahmen des Lebensmittel- und Futtermittelgesetzbuches, 34. Mitteilung, Bundesgesundheitsblatt 10, 14 (1967), einschließlich 219. Mitteilung, Bundesgesundheitsblatt 58, 1195-1197 (2015), Stand vom 01.07.2015,

(German Recommendation XXXVI for the health-related evaluation of materials and objects for the contact with foodstuffs in the frame of the Foodstuffs and Animal Feed Code, 34<sup>th</sup> memorandum, Bundesgesundheitsblatt 10, 14 (1967), including the 219<sup>th</sup> memorandum, Bundesgesundheitsblatt 58, 1195-1197 (2015), state of 1 July 2015).

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

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2015 edition), § 176.180.

Moreover, it is in compliance with 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 2013/2/EU of the Commission of 7 February 2013, Official Journal of the European Union L 37/10 of 8 February 2013,

and the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

with regard to the heavy metal contents.

Thus the board grade TP Premium according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry and such fatty foodstuffs, which a correction factor of at least 5 is assigned to according to Annex III, Table 2 of the Regulation (EU) No. 10/2011.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

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



(Behrendt)

Officially certified  
and authorized food  
chemist



The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**Staatlich anerkannter Sachverständiger zur Untersuchung der Gegenproben von Verpackungsmitteln aus Papier, Papp, 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 control 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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Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
 A file sample of the tested material is kept at the expert's office.  
 Réserve du matériel analysé est gardée au bureau de l'expert.