



StoraEnso

September 30, 2025

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# Declaration of Compliance

Version: 2025:1

## **Arctic Deer™**

|                            |                                                                                              |
|----------------------------|----------------------------------------------------------------------------------------------|
| <i>Trade name</i>          | Arctic Deer™ (hereafter referred to as the product)                                          |
| <i>Product description</i> | Fully coated CTMP board with uncoated reverse                                                |
| <i>Grammage</i>            | 195–350 g/m <sup>2</sup><br>For more information see technical specification.                |
| <i>Fiber source</i>        | 100% fresh fiber                                                                             |
| <i>Bleaching</i>           | All used pulps are elemental chlorine free (ECF-pulps)                                       |
| <i>Production site</i>     | Arctic Deer™ is manufactured at Business Unit Beihai, Stora Enso Food Service & Liquid Board |
| <i>Producer</i>            | Business Unit Beihai, Stora Enso Food Service & Liquid Board                                 |

Please note that safe and appropriate use in this context means food safety before converting. Any downstream operator in the food value chain is responsible for the suitability and food safety at the intended end-use. For questions regarding end-use (food type and/or conditions) please contact the local Stora Enso sales office for more information.

There might be technical limitations that need to take into account and/or test separately before use. E.g. product might need additional barrier layer when used in contact with liquids.

Information given in this declaration is based on our current knowledge, written confirmation from our raw material suppliers and/or analysis performed on representative samples based on worst case approach.

## **Compliance with European food contact legislation**

The product complies where applicable and under foreseeable conditions of use with

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- BfR Recommendation XXXVI on paper and board for food contact (2024)

This product is approved for direct food contact with dry and fatty foodstuffs. When there is a proper\* barrier layer between the product and packed food, it is also approved for contact with moist, acidic and alcoholic foodstuffs.

\*Proper barrier means any barrier layer that prevents aluminium migration to the food (e.g. PE layer).

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This product is intended for use under the following conditions:

- Long-term storage at room temperature or below (including freezer/fridge)
- Holding and reheating of food up to 90°C

This product is not intended for use under the following conditions:

- Microwave oven above 90 °C
- Conventional oven above 90 °C

Storage and handling recommendations are stated in the product specific technical specification (TDS, technical data sheet).

## Food Contact Guidelines

The Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles for food contact provides harmonised approach for self-regulation of paper and board. Stora Enso as a company supports and operates according to the Food Contact Guidelines. The document is prepared by CEPI and many packaging associations. More information on the guideline can be found on the following web site:

[https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines\\_2019.pdf](https://www.cepi-eurokraft.org/wp-content/uploads/2019/04/Food-Contact-Guidelines_2019.pdf)

## Analyses

### **Compliance with BfR Recommendation XXXVI**

The product complies with the requirements in BfR Recommendation XXXVI as follows. Analyses have been performed on representative samples of paperboard. Testing has been performed for all applicable substances which have an SML in BfR XXXVI. The results are compliant with BfR XXXVI.

#### *Heavy metals:*

Cadmium (Cd) < 5 µg/l in the cold water extract of the paperboard

Lead (Pb) < 10 µg/l in the cold water extract of the paperboard

Aluminium water extraction:

Please note that for dry and fatty food Aluminium cold water extraction is not required according to BfR XXXVI Recommendation.

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## *Chloropropanols*

1,3-DCP (1,3-dichloro-2-propanol) < 2 µg/l in the cold water extract of the paperboard

3-MCPD (3-monochloropropane diol) < 12 µg/l in the cold water extract of the paperboard

## *Formaldehyde:*

Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1.0 mg/dm<sup>2</sup>.

## *Optical brightening agents:*

Optical brightening agents, OBAs, are not used as raw material or intentionally added in the manufacturing of paperboard. Analysis has been performed according to EN 648 under test conditions A, D. There was no visible transfer (grade 5) for any of the test fluids.

## *Colour fastness:*

Analysis has been performed according to EN 646 under test conditions A, D. There was no visible transfer (grade 5) for any of the test fluids.

## *Transfer of antimicrobial constituents (Hemmhof test):*

Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents. We do not add surface biocides on top of the paperboard.

## *Slimicides and preservatives:*

*Applicable slimicides and preservatives are analysed on representative samples and results are below the limitations set in BfR XXXVI and/or BfR XIV.*

## **Other heavy metals**

*Chromium VI* < 0.25 mg/kg

*Mercury (Hg)* < 0.3 mg/kg

## **Compliance with US food contact legislation, FDA**

Based on the product's formulation, limitations on the chemical additives used in the product and the results of the applicable extraction tests, we confirm that this product complies with 21 C.F.R. §176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and §176.180 ("Components of paper and paperboard in contact with dry food") and may be used as intended in contact with all foods and under conditions of use A-H as described in tables 1 and 2 of 21 C.F.R. §176.170.

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## Substances

"Intentionally added substance" shall mean a substance that is deliberately utilized in the formulation of a material or component and where continued presence of the substance in the final product is intended to provide a specific characteristic, appearance or quality. Please note that Stora Enso does not independently test the product for the substances listed below. Rather, the information below is based on information provided by our chemical additive and raw material suppliers.

### **Animal origin**

Based on the information we have received from our chemical additive and raw material suppliers, no additive of animal origin is intentionally added in the finished paperboard product or used during the manufacturing process of the product.

We hereby confirm that substances causing Transmissible Spongiform Encephalopathies (TSEs), including Bovine Spongiform Encephalopathy (BSE) and Creutzfeldt Jacob Disease (CJD), are not intentionally added during the manufacturing of the product.

### **CMR substances**

Based on information we have received from our chemical additive and raw material suppliers of chemical additives, substances classified as "carcinogenic", "mutagenic" or "toxic for reproduction" in Regulation (EC) 1272/2008 as amended, in concentrations over the legislative limits stated in the material data sheets for our chemical products, are not intentionally added during the manufacturing of the product.

### **Dual Use Additives**

The following substances are also authorized as food additives by Regulation (EC) No 1333/2008 or as flavorings by Regulation (EC) No 1334/2008 and according to information from our chemical supplier may be present in the product:

| <b><i>Chemical substance</i></b> | <b><i>CAS-number</i></b> | <b><i>E number/FL number</i></b> |
|----------------------------------|--------------------------|----------------------------------|
| Starch phosphate                 | 11120-02-8               | E 1410                           |
| Ammonium sulphate                | 7783-20-2                | E 517                            |
| Adipic acid                      | 124-04-9                 | E 355                            |
| Silica                           | 7631-86-9                | E 551-553                        |
| Calcium carbonate                | 1317-65-3                | E 170                            |

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|                      |            |               |
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| Polyvinyl alcohol    | 25213-24-5 | E 1203        |
| Aluminium sulphate   | 10043-01-3 | E 520         |
| Sodium sulphate      | 7757-82-6  | E 514         |
| Sodium nitrate       | 7631-99-4  | E 251         |
| Critic acid          | 77-92-9    | E 330         |
| Sorbitan monolaurate | 1338-39-2  | E 493         |
| Polyethylene glycol  | 25322-68-3 | E 1521        |
| Xanthan gum          | 11138-66-2 | E 415         |
| Potassium acetate    | 127-08-2   | E 261         |
| Glycerol             | 56-81-5    | E 422         |
| Sodium hydroxide     | 1310-73-2  | E 524         |
| Maleic anhydride     | 108-31-6   | E 296         |
| Hexadecan-1-ol       | 36653-82-4 | FL No 02.096  |
| Octadecan-1-ol       | 112-92-5   | FL No 02.196  |
| Ethyl acrylate       | 140-88-5   | FL No. 09.037 |

## **EN 71-3 Safety of toys – Part 3: Migration of certain elements**

We hereby confirm that product, before further converting, comply with the requirements of EN 71-3:2019 + A1:2021 Safety of toys – Part 3: Migration of certain elements.

## **Food allergens**

Based on the information we have received from our chemical additive and raw material suppliers, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II as amended, the following food allergens or products derived thereof are not intentionally added during the manufacturing process of the product:

- Cereals containing gluten and products thereof\* (including wheat; FALCAP)
- 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 (including tree nut; FALCAP)\*
- Celery and products thereof

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- 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 SO<sub>2</sub>.
- Lupin and products thereof
- Molluscs and products thereof

*\* Please notice the exceptions in Commission Directive 1169/2011/EC, Annex II.*

## **GMO**

Based on the information we have received from our chemical additive and raw material suppliers, Genetically Modified Organisms (GMO) as defined by European Union\* are not intentionally added during the manufacturing of the product. Our suppliers can however not exclude adventitious and technically unavoidable contamination\*\*.

\* *Genetically Modified Organisms (europa.eu)*

\*\* *Regulation 1831/2003 on traceability and labeling 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."*

## **REACH Regulation (EC) 1907/2006**

To our best knowledge and based on the information from our chemical additive and raw material suppliers today we can confirm that none of our articles contains:

- Substances included on the Candidate List of SVHCs (including Annex XIV, Authorisation) in a concentration above 0.1% (w/w).
- Substances included in Annex XVII, Restrictions, where the restriction is applicable on our use.

## **Certified management systems at the production site/sites**

Certificates are available on the internet: <https://www.storaenso.com/en/download-centre?d=1&t=1>

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Beihai, 30 September 2025

## **Stora Enso Division Packaging Materials**

Beihai Mill

Martin Du

Manager, Product Safety

### **Disclaimer**

*It is the responsibility of the manufacturer of the final product/package to ensure that products fabricated from material manufactured by us meet all relevant regulatory and legislative requirements, specifications and limitations in the intended application and end use.*

*This information and its contents are subject to the following additional limitations and disclaimers:*

- Based on reasonable investigations, the information set out herein is accurate to our current knowledge only. We take no responsibility for information that has been provided to us by our suppliers and on which we have relied when producing the information contained herein.*
- This Declaration of Compliance is made and will be updated in accordance with applicable law. For the avoidance of doubt, we assume no liability for failing to update the document with information or changes that do not require updates of the DoC according to applicable law.*
- This information is only valid to the extent it has been signed and delivered by an authorized employee of the Stora Enso group.*
- Nothing in this information 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, (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 information forms an integral part of the delivery contract between us and the addressee and any limitations of liability set out in Stora Enso General Terms and Conditions for Sale shall apply to this information.*
- No one other than the addressee may rely on this information and we assume no liability whatsoever to any third party.*
- Any reference in this document to words "we", "our" or "us" shall mean Stora Enso Oyj and/or its affiliate(s), as applicable from time to time.*

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