

# Declaration of Compliance

Version: 2023:32

August 16<sup>th</sup>, 2023

<i>Trade Name</i>	<b>PRIMABAKE</b>
<i>Product description</i>	Baking paper made of virgin pulp and coated on both side with silicone
<i>Grammage</i>	Range between 30 g/m <sup>2</sup> to 57g/m <sup>2</sup>
<i>Coating layer</i>	One side or both sides coated with silicone Coating weights vary depending on the specifications For more information see the technical specification
<i>Fiber source</i>	Virgin fiber bleached or unbleached from controlled wood, PEFC or FSC® managed forest
<i>Bleaching</i>	All pulps are ECF (Elementary chlorine free) or TCF (Totally chlorine free)
<i>Production site</i>	Papeteries du Léman C.S 30043 74201 Thonon - FRANCE

## Typical Applications

**Primabake paper** is intended to be used for baking dry, wet and fatty foodstuffs and for separating frozen food under the following conditions:

- Conventional ovens up to 220°C for 2h00
- Microwave ovens without time restriction
- Freezer and fridge under -18°C

The quality of Primabake paper is guaranteed as long as the paper is stored properly: in its original packaging between 5 and 50°C and away from dust, moisture and rain.

## Food contact compliance

We confirm that our PRIMABAKE range is manufactured in compliance to the current following regulations regarding the substances and materials intended to be used in contact with food:

- **Regulation (EC) N° 1935/2004** on materials and articles intended to come into contact with food
- **Regulation (EC) N° 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food
- Germany: **BfR XXXVI** and **XXXVI/2**
- French decrees 2011-385 & 2007-766
- DGCCRF / MCDA Sheet 4 (V02 – 01/01/2019) on Food contact ability of organic materials based on plant fibres intended to come into contact with foodstuffs
- Italy: Ministerial Decree of 21 March 1973
- Spain: Royal Decree 847/2011
- Swiss: Regulation SR 817.023.21
- USA: **FDA 21 CFR § 176-170 & 176-180**
- **China GB 9685-2016**: National Standards for the Use of Additives in Food Contact Materials
- **China GB 4806.8-2022**: National Food Safety Standard for Paper & Paperboard in contact with Foodstuffs

## Storage and handling recommendations

In order to guarantee product quality, the product must be stored indoor in its original wrapping, sheltered from rain and snow. The recommended storage conditions are at a temperature of around 20°C and relative humidity of 50%.


For appropriate converting behavior, it is recommended to store and unwrap the product at least 24h00 in the workshop area, in order to stabilize the paper in moisture and temperature. Remove the first turn of paper before converting it into rolls or format.

If a splice is present in the roll, it will be indicated on the edge by an edible ink. In this case, stop the converting process at its level, remove the splice and restart the converting process.

Considering these good practices, Primabake paper can be used 5 years after manufacture.

## Disposal and recovery

The Primabake range is suitable for recovery by:

- Material recycling according to EN 13430  
Test performed according to CEPI recyclability Test Method Version 2 (2022) and standard UNI 11743:2019. Primabake baking paper is classified 'suitable for standard mill recycling at 68/100' according to 4evergreen protocol and as level A for recyclability according to Aticelca Evaluation Method 501:2019.
- Energy recovery according to EN 13431
- Waste recycling: compostable according to EN13432  
Certificate of compliance 1495P E 21 available on our [www.primabake.com](http://www.primabake.com) website 

Considering the above points, our Primabake range is in compliance with the European Directive 2004/12/EC amending Directive 94/62/EC on packaging and packaging waste.

## Purity and Migration tests

Fluorescent whitening agents: Analysis was made by UV irradiation. PRIMABAKE did not contain optically brightened fibers or agents.

Degradable Compounds containing Nitrogen: After degradation at 220°C, the nitrogen content has been determined after Kjeldahl disintegration by photometry according to DIN 38 406-E5-1. The amount of degradable compounds containing Nitrogen is < 0.025 mg/kg dry matter.

### Microbiological and pathogenic analyses

Method of test	Unity	Results
<b>Pathogenic analyses – ISO 8784-2005 and NF V08-056 (ISO 7937)</b>		
Staphylococcus aureus	ufc/g	absence
Pseudomonas aeruginosa	ufc/g	absence
Candida albicans	ufc/g	absence
<b>Microbiological analyses – ISO 8784-2005 and NF V08-056 (ISO 7937)</b>		
Total flora at 30°C – ISO 8784-1	ufc/g	max 18
Yeast at 30°C – ISO 8784-1	ufc/g	max 4
Mold at 30 °C – ISO 8784-1	ufc/g	max 4

Sensory Analysis for Odour at 220°C: The examination was made on the basis of DIN 10 955. No formation of odour indication a decomposition of the product could be noticed.

Sensory Analysis for Indirect Transition of Taste: The examination was made according to EN 1230-2. The result of the evaluation is < 1.

For information:

- 0 = no perceptible off-flavour
- 1 = off-flavour just perceptible (still difficult to define)
- 2 = moderate off-flavour
- 3 = moderately strong off-flavour
- 4 = strong off-flavour

### **Compliance with BfR Recommendation XXXVI/2**

#### Heavy metals:

Arsenic	(As)	not determinable	< 2	mg/kg dry matter
Cadmium	(Cd)	not determinable	< 0.5	mg/kg dry matter
Mercury	(Hg)	not determinable	< 0.25	mg/kg dry matter
Chromium	(Cr)	not determinable	< 1	mg/kg dry matter
Lead	(Pb)	not determinable	< 5	mg/kg dry matter

Anthraquinone: Analysis has been performed according to SOP 160.200 by means of gas chromatography and mass spectrometric detection. The amount of Anthraquinone is < 0.13 mg/kg dry matter.

Glyoxal: Analysis has been performed according to the DIN 54603. The amount of Glyoxal is < 0.005 mg/kg dry matter.

Formaldehyde (methanal): Analysis has been performed according to the acetylacetone method in conformity with DIN EN 1541. The amount of formaldehyde is < 0.004 mg/kg dry matter.

Pentachlorophenol (PCP): The determination has been performed according to DIN EN ISO 15320 by means of gas chromatography. The amount of PCP is not determinable < 0,01 mg/kg dry matter

Polychlorinated Biphenyls (PCB): The determination has been performed according to DIN EN ISO 15318 by means of gas chromatography.

2,2',5-Trichlorobiphenyl	not determinable	< 0.01 mg/kg
2,4,4'-Trichlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',5,5'-Tetrachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',4,5,5'-Pentachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',3,4,4',5'-Hexachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',4,4',5,5'-Hexachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',3,4,4',5,5'-Heptachlorobiphenyl	not determinable	< 0.01 mg/kg

Transfer of Antimicrobial Constituents: Analysis has been performed according to DIN EN 1104. There is no transfer of antimicrobial constituents and there is no inhibition zone with *Aspergillus niger* and *Bacillus subtilis*.

### **Extraction tests according to the FDA Regulations**

The tests has been performed according to FDA, CFR title 21, Ch.I, § 176.170.

The extraction with Water, 2h at 121°C – The amount of extract is 0.10 mg/sq inch.

The extraction with n-Heptane, 2h at 66°C – The amount of extract is < 0.05 mg/sq inch.

### **Migration tests according to Commission Regulation (EU) 2019/37**

The overall migration tests have been performed on representative sample of PRIMABAKE paper according to EN 1186-4, EN 1186-5 and EN 1186-14 with the following results. The overall migration limit 10mg/dm<sup>2</sup> stipulated in the Commission Regulation (EU) 2019/37 is not exceeded.

#### Overall migration aqueous simulant

Testing condition: 4 hours at 100°C - area / Volume: 1dm<sup>2</sup>/165ml

Food Simulant	Individual values	Mean value	Limiting value <sup>(1)</sup>	Conclusion
10% Ethanol	1.3 mg/dm <sup>2</sup> 2.3 mg/dm <sup>2</sup> 1.5 mg/dm <sup>2</sup>	1.7 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup>	PASS
3% Acetic acid	6.1 mg/dm <sup>2</sup> 6.9 mg/dm <sup>2</sup> 3.5 mg/dm <sup>2</sup>	5.5 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup>	PASS

(1) According to Regulation (EU) 2019/37

#### Overall migration Isooctane

Testing conditions: 4 hours at 60°C - area / Volume: 1dm<sup>2</sup>/165ml

Food Simulant	Individual values	Mean value	Limiting value <sup>(1)</sup>	Conclusion
Isooctane	0.3 mg/dm <sup>2</sup> 0.2 mg/dm <sup>2</sup> 0.2 mg/dm <sup>2</sup>	0.2 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup> *	PASS

(1) According to Regulation (EU) 2019/37

#### Overall migration Ethanol95

Testing conditions: 6 hours at 60°C - area / Volume: 1dm<sup>2</sup>/165ml

Food Simulant	Individual values	Mean value	Limiting value <sup>(1)</sup>	Conclusion
Ethanol 95	1.4 mg/dm <sup>2</sup> 1.8 mg/dm <sup>2</sup> 1.7 mg/dm <sup>2</sup>	1.6 mg/dm <sup>2</sup>	10 mg/dm <sup>2</sup> *	PASS

(1) According to Regulation (EU) 2019/37

\* The following analytical tolerances are admitted: 1 mg/dm<sup>2</sup> in migration tests with aqueous simulants, 3 mg/dm<sup>2</sup> in migration tests with rectified olive oil.

With regard to manner and extent of the performed examinations, PRIMABAKE complies with the current legal requirements of Regulation (EC) No. 1935/2004 and of Regulation (EU) 2019/37.

## Substances and Process

PRIMABAKE fulfils the current requirements of the CONEG regulation and the European Directive 2004/12/CE with regards to the heavy metals content of packaging as well as RoHS requirements (2002/95/EC).

We hereby confirm that the substances listed below are not intentionally added during the production of the paper. Please note that we do not analyze the paper for the substances listed below:

- Fluor and Polytetrafluoroethylene (PTFE)
- Toluene
- Poly and Per-Fluorinated Alkylated Substance PFAS (PFOA, PFOS free) and Gen-X
- Perfluorooctanoic acid (PFOA), its salt and PFOA related substances
- BPA (bisphenol A), BADGE (bisphenol A diglycidyl Ether), BFDGE (Bisphenol F Diglycidyl Ether) nor NOGE (Novolac Glycidyl Ether) and derivatives (2005/1895) nor DEHM.
- Melamine (Cyanuramide , Cyanurotriamine)
- Orthophenylphenol (OPP)
- Phtalates (DEHP, DBP, BBP, DINP, DIDP, DNOP) and derivatives as per 2005/84/CE, 2003/368
- Known allergenic components as listed in Regulation (EC) N°1169/2011
- Mineral oils (MOSH and MOAH)
- Ozone-depleting substances (low molecular weight CFC, HCFC, HCF or HCs) as additives or within the manufacturing process for those products
- Genetically modified products (GMO)
- Nanomaterials
- Titanium dioxide (TiO<sub>2</sub>)
- Chrome of any sorts (Cr)
- PVC and Chloropolymer (PVDC)
- IsopropylThioXanthon (ITX)
- Benzophenone, 4 methyl-benzophenone, 4 hydroxy-benzophenone

Hereby, we confirm that during the whole manufacturing process, our paper is not exposed to ionization treatment. Consequently, our baking paper range PRIMABAKE is in conformity with regards to the European directive 1999/2/CE of the 22<sup>nd</sup> February 1999.

## Additional legislation and regulations

### REACH

We hereby confirm that our Primabake do not contain any substances which are classified as carcinogenic – causing cancer of category one and two. We continuously check the development of the Candidate List and the substances for authorization and only accept and use chemicals which comply with the REACH requirements. To our knowledge none of our articles contain any Substance of very High Concern that is on the Candidate List in a concentration above 0.1% (W/W).

Consequently, we guarantee that our Primabake product comply with the REACH regulation.

### Kosher Certificate

The PRIMABAKE range is certified kosher including Passover by the Star K and the Beth Din of Paris.

### Halal Certificate

The PRIMABAKE range is certified Halal by European Halal Services.

### Nordic Swan Ecolabel

The PRIMABAKE range is certified by Nordic Swan under the n° 3049 0027.

## Certified management systems at the production site



An **HACCP** approach was initiating in 2016. The **BRC** certification is expected by 2023.

## Disclaimer

This certificate and its content are subject to the following additional limitations and disclaimers:

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