Cert GmbH Aschaffenburg

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

7 August 2026
Dr. Dr/lls-kr

UNBEDENKLICHKEITSERKLÄRUNG
CERTIFICATE OF COMPLIANCE
CERTIFICAT DE CONFORMITE

eingetragen registered no. registré	67745 U 26
für for pour	Holmen Board and Paper AB Braviken Papermill Östra Bravikenvägen 20 601 88 Norrköping Sweden
Produkt Product Produit	Holmen SURE

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

It was examined by us in consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact”, current status, in connection with the BfR guideline “Testing of substance transfers from consumer articles made of paper, cardboard and paperboard”, as of 28 September 2023),

and according to the Council of Europe’s

Technical guide on paper and board used in food contact materials and articles, as of 2021,

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Die Veröffentlichung von Ergebnissen unserer Arbeiten und Gutachten sowie die Verwendung für Werbezwecke bedürfen – auch auszugsweise – unserer schriftlichen Genehmigung.
Erfüllungsort und Gerichtsstand Aschaffenburg.

as well as according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2025 edition), § 176.180,

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 paper grade was tested for heavy metals and total organic fluorine (TOF) according to the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025,

as well as for heavy metals according to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

The paper 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, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, article 3, 1. (a) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 3 des Gesetzes vom 3. Februar 2026 (BGBl. 2026 I Nr. 29), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl I. p. 4253; 2022 I p.28), last amended by article 3 of the act of 3 February 2026 (BGBl. 2026 I no. 29), §§ 30 and 31),

and conforms to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 229. Mitteilung, Bundesgesundheitsblatt 68 (2025) 1212-1216, Stand vom 01.10.2025, einschließlich 230. Mitteilung, Bundesgesundheitsblatt 69 (2026) 729-730,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 229th Announcement, Bundesgesundheitsblatt 68 (2025) 1212-1216, as of 1 October 2025, including 230th Announcement, Bundesgesundheitsblatt 69 (2026) 729-730).

The demands of the

Council of Europe Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food of 7 October 2020, sections 3.1 and 3.3,

as well as of the supplementary

Technical guide on paper and board used in food contact materials and articles, as of 2021,

are met by the paper grade.

Considering the associated EU Guidance document, it also meets the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5, 4. and 5.,

as well as the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021,

regarding the heavy metal content.

Thus the paper grade **Holmen SURE** according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, moist and fatty food.

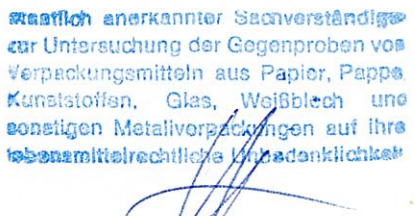
Furthermore, the paper grade is in compliance with the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (April 1, 2025 edition), § 176.180.

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

Certification decision





(Höfert)
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, Pappe, Kunststoffen, Glas, Weißblech und sonstigen Metallverpackungen auf ihre lebensmittelrechtliche Unbedenklichkeit

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce.

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 contrôle 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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