



## Regulatory Compliance

Statement for:	<b>INDUSTRIAS BOLCAR SA</b>
Products:	BillerudKorsnäs PERFORMANCE WHITE SE BillerudKorsnäs QUICKFILL® WHITE SE BillerudKorsnäs QUICKFILL® WHITE SINGLE BillerudKorsnäs PRIME WHITE
Production site:	<b>BillerudKorsnäs Sweden AB Karlsborg Mill</b>

## Food contact

The products are suitable for packaging of dry, aqueous and fatty foods. For packing of aqueous and fatty products we recommend a suitable barrier to avoid the food to affect the physical properties of the products.

The products are manufactured from virgin fibres with addition of chemicals that meet the demands in FDA and BfR and also in accordance with good manufacturing practice.

Under normal, applicable and foreseeable conditions of use, the products do not transfer any constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof.

The products comply with the applicable paragraphs in:

- Regulation (EC) No 1935/2004 with amendments on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 with amendments on good manufacturing practice for materials and articles intended to come into contact with food.
- The German Food Law §§ 30 und 31 in der Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (LFGB)
- BfR, Recommendation XXXVI (July 1<sup>st</sup>, 2016), paper or paperboard which is intended to be used at temperatures up to 90°C (holding and reheating of food)
- FDA Code of Federal Regulation Title 21, Chapter 1, §176.170, §176.180 (April 1<sup>st</sup>, 2016), Components of paper and paperboard in contact with aqueous, fatty and dry foods
  - As BillerudKorsnäs does not manufacture the finished product, we need to notify you that our product contains chemicals listed in paragraph (b) and as such the final product must be tested in accordance with paragraph (c) of 21 CFR 176.170



## **Packaging and Packaging Waste Directive**

The products comply with Packaging and Packaging Waste Directive 94/62/EC with amendments. This directive defines requirements for the manufacturing and composition of packaging and prescribes fulfilment of essential requirements. This can be fulfilled by the use of harmonized EN standards.

The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium is well below 100 parts per million by weight.

The level of substances classified as hazardous to the environment is less than 0.1% and minimized (EN 13428).

The products are recyclable (EN13430) and are well suited for energy recovery as they have a high caloric value (EN 13431). On biodegradation the products are finally decomposed into mainly carbon dioxide, biomass and water (EN13432 clauses 4.2.2 and 4.3.2). The products have not been evaluated for being recoverable through composting.

## **REACH**

BillerudKorsnäs sites comply with the requirements/obligations of REACH, Regulation (EC) No 1907/2006 with amendments. BillerudKorsnäs is mainly a Downstream User of chemicals, which means that our suppliers are responsible for the registration of the chemicals that we purchase. Substances and Intermediates produced at our pulp mills are registered.

Pulp is exempted from REACH registration.

Our fibre based products are defined as articles according to REACH.

There are requirements in REACH for substances of very high concern (SVHC). We regularly monitor the amendments of the Candidate list for Substances of Very High Concern and in the Annex XIV of the Regulation.

Based on information from our suppliers we state that no SVHC substances listed in the "Candidate List of Substances of Very High Concern" from the European Chemicals Agency are present in concentrations above 0.1% in our products

### Disclaimer

The information provided in this declaration is provided based on our actual knowledge about the product and its components. BillerudKorsnäs assumes no responsibility for any deviations from this information which is due to facts or circumstances beyond our actual knowledge about the product and its components.

The product is sold without any express or implied warranty as regards fitness for any specific purpose of use. It is the user's responsibility to satisfy themselves as to the paper's suitability for the particular purpose(s) for which the user intends to use the paper and to obtain all necessary information for such assessment. It is the customer's responsibility to assure the appropriate, safe and legal use and handling of our products.

The information in this declaration is subject to the limitations of liability and other applicable provisions set forth in general trade rules or any other separate written agreement governing the sale and purchase of products between BillerudKorsnäs' and the addressee of this declaration.



# BILLERUDKORSNÄS

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This statement is valid for 18 months

BillerudKorsnäs Sweden AB Karlsborg Mill  
Technical Department

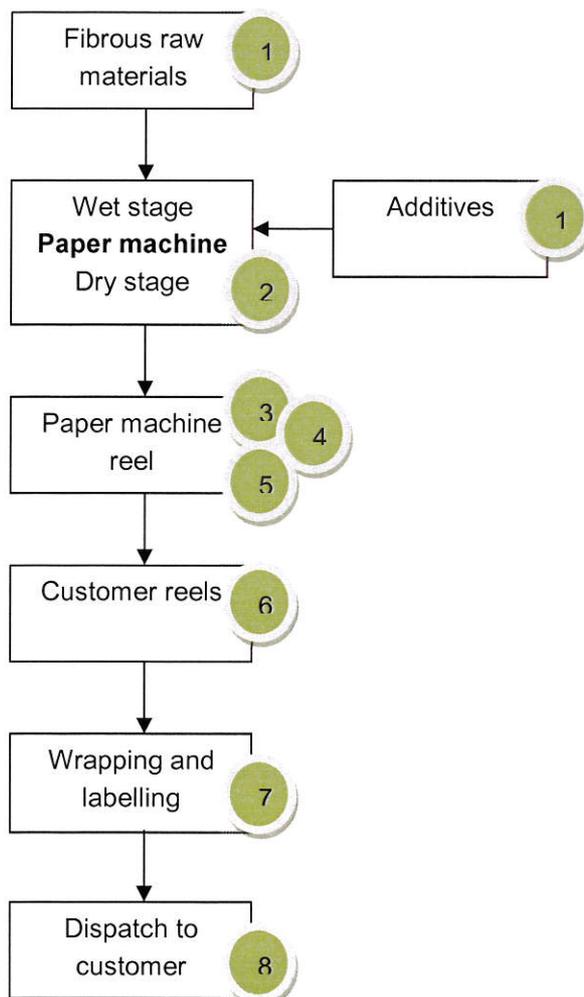
Laura Mansikka  
Environmental Engineer

## Statement regarding Traceability

Statement for: **INDUSTRIAS BOLCAR SA**  
Products: BillerudKorsnäs PERFORMANCE WHITE SE  
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We hereby confirm that we comply with the traceability procedures as laid out in ISO 9001, ISO 14001, FSC and PEFC. In addition our paper products comply with EC/1935/2004 which is a regulation governing materials and articles intended to come into contact with food. This regulation also includes the need to ensure traceability (article 17).

The following figure will show how we are working to ensure traceability during manufacturing of above mentioned paper products.





## **1. Documentation of raw materials**

Our raw materials are bulk additives and therefore traced by time. It is possible to relate the time at which the batch of bulk additive concerned was introduced to the process. The time of delivery of bulk additives gives the relevant batch number for the bulk additive or traced by time in their production. Thus we can trace which batch numbers of the bulk additives that have been used in manufacturing of a specific order.

The pulp is produced at our own mill.

## **2. Written recording of process**

A detailed, timed, running log is kept which records all relevant production activities and relates time of production to raw materials and final product reel number.

All our paper products are produced on order. When we receive an order from a customer the order gets a specific order number (production run number) that follows the order throughout the production. The order number is registered in the paper machines computer when we are about to produce the order and all information about the production of the specific order is registered in this system.

Any agreed changes are registered in our computer system. When the paper machine operators type the Production run number in the production system, they can see if there are any specific actions they have to consider during the production and when they shall release the produced paper of the order they are about to produce.

## **3. Quality control tests**

Quality control tests for specific physical properties are performed on every produced jumbo roll (tambour) = paper machine reel. Records show the time of production, used amounts of raw materials as well as testing results.

If the material does not fit the specification the material is isolated in a specified area. After a more thorough investigation the material is either released or rejected.

Additionally many properties such as weight, moisture, thickness and porosity are measured on-line.

## **4. Individual jumbo rolls**

All jumbo rolls are sequentially numbered, thus linking raw materials to customer order.

## **5. Retained samples**

Samples are taken from every produced jumbo roll and retained for at least one year.

## **6. Written recording of process**

Jumbo rolls are slit into smaller reels. A time log is kept which records jumbo roll number and defines from where, inside it, the slit reel originates and allocates a unique number to the latter.

## **7. Wrapping and labeling**

Wrapping material such as cores, end plugs, wrapping paper etc. can be traced by order number when used in our production.

All individual reels are marked and/or labelled with:

- Supplier name
- Customer specific information, if available
- Order number
- Reel number



- Date of packaging
- Width
- Weight

Bar code systems are used, for example EAN 128.

The reels are wrapped in a paper with a moisture barrier (reelwrap) and as paper is a stable product the quality of the paper should be the same when it reaches the customer as it was at the production site as long as the vehicle keeps on track.

## **8. Dispatch to customer**

Every paper reel has a unique bar code with information of order number and reel number. Before loading the staff in our warehouse register the order number for the order they are about to load in the truck's computer system. Every reel is registered when loaded to the cargo and if the bar code of a specific reel does not fit the order number in the computer system the truck driver is notified and can not accept the loading.

## **Inspection of vehicles**

The vehicles are inspected and have to be in an acceptable status before loading.

## **Recall of product**

Routines are in place to recall products if needed. Decision to recall is made, in communication with the customer, by market responsible based on joint recommendations from product safety and technical service.

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Technical Department

Laura Mansikka  
Environmental Engineer



## Product Safety Management System

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Production site: **BillerudKorsnäs Sweden AB Karlsborg Mill**

BillerudKorsnäs Sweden AB Karlsborg Mill produces pulp and paper products. BillerudKorsnäs Sweden AB Karlsborg Mill has certified quality- and environmental assurance systems according to ISO 9001 and ISO 14001.

We fulfil the EC 2023/2006 GMP (Good Manufacturing Practice) system. Annex 1 is not applicable, since the paper is not printed.

Laws and regulations for product safety are not general. Every country has its own national legislation, which in Europe often are implementations of the European Union directives.

To verify that BillerudKorsnäs Sweden AB Karlsborg Mill fulfils different legislations in the product safety area, we regularly analyse paper and pulp samples in independent laboratories according to e.g. BfR and FDA.

In our production we only use additives, which fulfil the demands in BfR and/or FDA.

BillerudKorsnäs Sweden AB Karlsborg Mill has a hygiene policy and IPM - Integrated Pest Management – agreement. Hazard and critical control points in the pulp and paper production have been identified according to HACCP (Hazard Analysis Critical Control Points). No critical control points were identified. We are also working with risk assessments to identify risks according to:

- Physical (foreign bodies etc.)
- Chemical (food contact ability rules etc.)
- Biological (insects, rodents etc.)
- Microbiological (moulds and bacteria)
- Sensory (taste/odour)

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Technical Department

Laura Mansikka  
Environmental Engineer



## Statement regarding Migration tests on paper

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Migration tests with food simulants according to regulation (EC) no 10/2011 are not applicable for paper products. We have made extraction tests according to relevant BfR and FDA sections (please see enclosed "Regulatory Compliance"). All test results was within the limits for the extraction tests.

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