



StoraEnso

Declaration of Compliance

Version: 2025:1

PERFORMA LUMI™

<i>Trade name</i>	PERFORMA LUMI™ (hereafter referred to as the product)
<i>Product description</i>	Fully coated CTMP board with light pigment coated reverse, FiberLight Tec™
<i>Grammage</i>	205 – 310 g/m ² 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>	The product is manufactured at Stora Enso, Oulu Mill
<i>Producer</i>	Stora Enso, Oulu Mill

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 needs to be taken into account and tested 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, Paper and board (2024)

This product is approved for direct food contact with dry and fatty foodstuffs.



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This product is intended for use under the following conditions:

- Any 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 other packaging associations. More information on the guideline (updated 2019) can be found on the following web site:

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. The criteria to assess compliance with BfR requirements, expressed in mg/kg, were calculated assuming a conventional surface area to volume ratio of 6 dm²/kg of food.

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



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Aluminium:

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

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/dm²

Optical brightening agents:

Optical brightening agents, OBAs, are used in the manufacturing of paperboard. Analysis has been performed according to EN 648 under test conditions A, B, C. There was no visible transfer (grade 5) with olive oil simulant.

Colour fastness:

Analysis has been performed according to EN 646 under test conditions A. 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:

Required analysis has been performed on representative samples and results are below the limitations set in BfR XXXVI and/or BfR XIV recommendations.

Other heavy metals

Chromium VI < 0.25 mg/kg

Mercury (Hg) < 0.3 mg/kg

Nickel < 2.0 mg/dm² as required in Finnish KTM decree 268/1992

Chromium < 2.0 mg/dm² as required in Finnish KTM decree 268/1992

Lead < 0.50 mg/dm² as required in Finnish KTM decree 268/1992

Cadmium < 0.10 mg/dm² as required in Finnish KTM decree 268/1992



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Compliance with Italian food contact legislation

Based on the analysis of representative board samples performed at the Italian laboratory having the aim to ascertain the composition and purity requirements as per Italian Ministry Decree dated 21st of March 1973 and subsequent amendments, **PERFORMA LUMI™** (205 gsm – 310 gsm,) regardless of which side, is suitable to come into contact with food products for which migration tests are not required for (dry foods) and food products for which migration tests are required (only fatty foods).

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, including all food contact substances present in this paperboard, 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 food types III, IV-A, V, VII-A, VIII, IX and under conditions of use A-H as described in tables 1 and 2 of 21 C.F.R. §176.170.

Please note that this product is not intended for use as a food packaging material used in contact with infant* formula or human milk without a proper functional barrier and we cannot confirm that this product is authorized for such uses under applicable FDA standards.

* The term "infant" refers to individuals aged 0- 6 months and "Infant food" is limited to infant formula and human milk. For more information please check with FDA Guidance on "Preparation of Food Contact Notifications for Food Contact Substances in Contact with Infant Formula and/or Human Milk". <https://www.fda.gov/media/124714/download>

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.



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Version: 2025:1**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 the information from our suppliers of chemical additives and our concentration and composition calculations, we can confirm that substances classified as "carcinogenic", "mutagenic" or "toxic for reproduction" in Regulation (EC) 1272/2008 as amended, are expected to be below 0.1% (w/w) in our product.

Dual Use Additives

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

<i>Chemical substance</i>	<i>CAS-number</i>	<i>E number/FL number</i>
Adipic acid	124-04-9	E355
Ammonium sulfate	7783-20-2	E517
Bentonite rock clay	1302-78-9	E558
Calcium carbonate	1317-65-3	E170
Citric acid	77-92-9	E330
Glycerin	56-81-5	E422
Kaolin	1332-58-7	E559
Magnesium chloride	7786-30-3	E511
Na-CMC	9004-32-4	E466
Polyethylene glycol	25322-68-3	E1521
Potassium acetate	127-08-2	E261
Silica	7631-86-9	E551
Silicon dioxide	112926-00-8	E551
Sodium bisulfite	7631-90-5	E222
Sodium carbonate	497-19-8	E500
Sodium hydroxide	1310-73-2	E524



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<i>Chemical substance</i>	<i>CAS-number</i>	<i>E number/FL number</i>
Sodium metabisulfite	7681-57-4	E223
Sodium nitrate	7631-99-4	E251
Sodium sulfate	7757-82-6	E514
Sorbitan monolaurate	1338-39-2	E493
Stearic acid	57-11-4	E570
Sulfuric acid	7664-93-9	E513

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 of the product:

- Crustaceans and products thereof (*Including Crustacean shellfish; FALCPA*)
- 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 nuts; FALCPA*)
- Celery and products thereof
- 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 SO₂.
- Lupin and products thereof
- Molluscs and products thereof

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



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Some of the additives used in the manufacturing of the product contain wheat and minor amounts of gluten. From a US standpoint, the use of these ingredients prohibits the use of "gluten free" claims. From an EU standpoint, according to Commission Regulation (EC) No 828/2014 foodstuffs may be sold as 'gluten-free' in the EU if the gluten content does not exceed 20 mg/kg in the food as sold to the final consumer. Based on the worst-case calculations the migration of gluten does not exceed 20 mg/kg food. Worst case calculation is based on the assumption that 1 kg food would be in contact with 6 dm² of product.

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. However, our suppliers cannot exclude adventitious and technically unavoidable contamination**.

* *Genetically Modified Organisms (europa.eu)*

** *Regulation 1830/2003 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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Oulu, 4 September 2025

Stora Enso, Oulu Mill

Kati Metsälä
Product Safety Manager

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.*