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PRODUCT SAFETY STATEMENT

Product Name(s)	MetsäBoard Pro FBB Bright
Production Site(s)	Metsä Board Äänekoski Finland (Paperboard), Metsä Board Husum Sweden (Paperboard)
Product Description	Fully coated bleached paperboard with white back

The content of this statement is valid for the Metsä Board trade name(s) mentioned above.

Metsä Board is a leading European producer of premium fresh fibre paperboards. All our paperboards and pulps are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Products are manufactured in Metsä Board production sites in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO/FSSC 22000, PEFC™ and FSC®.

FOOD CONTACT

Declaration of Compliance

We hereby state that this product is in compliance with the following food contact regulations and recommendations. The informed compliance applies to both sides of the product, unless otherwise is stated. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations listed below. Additionally, the compliance evaluations are based on the declarations of compliance provided by our raw material suppliers, and complementary information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

EU:	
Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Germany:	
BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact (version 1.9.2017)	Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact
Italy:	
D.M. 21/3/1973 and following updates and amendments concerning composition requirements (fillers, auxiliary substances and	Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact

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fibrous matters) for food products for which migration tests are required for, purity requirements (PCBs, migration of lead) and migration of phenols and cresols	
France:	
Fiche MCDA n°4 (V02 - 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires" as of 01/01/2019, with particular reference to the criteria of paragraph 3 and to paragraph 4	Both dry and non-fatty foods as well as moist and fatty foods, provided that in latter case only the back surface is in direct food contact
USA:	
The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 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")	All food types, excluding infant formula and breast milk, under FDA's Conditions of Use A ("High temperature heat-sterilized (e.g., over 212°F)") through H ("Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use")

NON-USE WARRANTY

We hereby warrant that based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0.1% by weight of the product.

1. Recycled material	This product is manufactured from virgin materials and does not contain any recycled materials.
2. Plastic	This product is not considered to be plastic and does not contain plastic components according to the plastic definition of *ISO 472:2013(E/F) Plastics — Vocabulary* and *Terminology for biorelated polymers and applications (IUPAC Recommendations 2012)*.
3. Chlorine	Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF and BCTMP process is TCF.
4. Fluorine	Fluorinated chemicals, such as perfluorinated chemicals (PFCs) including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid and its derivatives (PFOS) and other per- and polyfluoroalkyl substances (PFASs), are not used in the manufacturing of the product. According to third-party accredited laboratory testing, fluorine has not been detected in the product above a level indicating the use of PFCs.

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	The following three specific perfluoroalkyl ethyl containing food-contact substances have not been used in the manufacturing of the product as listed in the rule 81 FR 5 by the Food and Drug Administration on 01/04/2016: 1. Diethanolamine salts of mono- and bis (1H, 1H, 2H, 2H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solids basis 2. Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl)thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2) 3. Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis[([gamma], [omega]-perfluoro C4-20 alkylthio) methyl]-1,3-propanediol, polyphosphoric acid and ammonium hydroxide
5. Heavy metals	No heavy metals are intentionally added during the manufacturing process. • Heavy metal traces are under the limits regulated in Finnish legislation 268/1992 Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in • Directive 94/62/EC on Packaging and Packaging Waste and its amendments • TPCH (CONEG): The Model Toxics in Packaging Legislation
6. Genetically modified organisms (GMO)	No genetically modified organisms (GMO) are used as raw materials. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.
7. Animal origin, Halal, Kosher	Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.
8. Conflict minerals	Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacturing of the product. We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
9. POP Regulation and brominated flame retardants	Substances listed in the Regulation (EC) No 2019/1021 on persistent organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).
10. RoHS 2	Directive 2011/65/EU (RoHS 2 Annex II) on the restrictions of the use of certain brominated flame retardants, heavy metals and phthalates in electrical and electronic equipment.
11. California Proposition 65	Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

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12. Endocrine disrupting chemicals (EDC)	Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 28.9.2021)
13. Ozone depleting substances	Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer. Substances listed in Montreal Protocol 1987.
14. UNEP 12 Chemicals, Persistent organic pollutants	Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment Programme 1997.
15. Epoxy derivatives	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
16. Other substances of concern	Anthraquinone Asbestos Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenol A and Bisphenol-A DiGlycidyl Ether (BADGE) Bisphenol F and Bisphenol-F DiGlycidyl Ether (BFDGE) Bisphenol S Butylated hydroxyanisole (BHA) Butylated hydroxytoluene (BHT) Colophony Creosote Fragrances Isopropylthioxanthone (ITX) Melamine Natural rubber latex materials Nitrocellulose Nonylphenols and nonylphenol ethoxylates, TNPP Novolac glycidyl ethers (NOGE) Polyvinylchloride (PVC) Titanium dioxide Triclosan

INDUSTRY GUIDELINES AND POLICIES

Metsä Board complies with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019, formally called "Industry Guideline" The guideline is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association), ACE (beverage cartons alliance), CCB (CEPI containerboard), FEFCO (corrugated packaging) and ETS (tissue paper association).

Metsä Board complies with the Paper and board used in food contact materials and articles published by the European Directorate for the Quality of Medicines & HealthCare of the Council of Europe (EDQM) (1st Edition 2021).

This product contains the following dual use substances with a quantitative restriction in food legislation:

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Calcium carbonate (E170).

REACH

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used.

This product complies with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used as raw materials.

According to REACH Regulation chemical suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on this information this product does not contain Substances of Very High Concern above the reporting limit of 0.1%.

ALLERGENS

We hereby warrant that substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of this product. This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs.

Some modified starches used as raw materials may originate from wheat or barley. However, this product can be considered gluten-free according to the definitions of Commission Implementing Regulation (EU) No 828/2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food; Gluten-Free Labeling of Foods - A Rule by the Food and Drug Administration on 08/05/2013 USA FDA.

MINERAL OIL (MOSH/MOAH)

This product is manufactured from fresh fibres and does not contain any printed or recycled material. Mineral oils are not used as raw materials in the manufacturing of this product. All used production chemicals and additives are approved for food contact.

BIOCIDAL PRODUCTS

According to Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, this product is not defined as a treated article.

Biocides are used in the manufacturing process of this product to prevent harmful microbiological growth and to ensure the microbiological purity of the final product. No surface biocides are used and the transfer of antimicrobial constituents from the final product is tested in a third party laboratory to ensure no antimicrobial effect.

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NANOMATERIALS

We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paperboard production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

PALM OIL

Palm oil is not used as a raw material in the production process. Certain chemicals used in the production may contain minor quantities of palm oil, however, the possible amount of palm oil in the final product is low and never exceeding 0.1%. Metsä Board, as a responsible paperboard and pulp producer, requires its suppliers to ensure that their sourcing of palm oil is or will be according to the principles and criteria of the Roundtable of Sustainable Palm Oil (RSPO).

TOYS

This product complies with Directive 2009/48/EC on the safety of toys Annex II, Part III, point 13 migration limits for scraped-off toy materials, analysed according to standard DIN EN 71-3:2019.

This product complies with the restrictions for Phthalates, Benzene and Azocolorants/Azodyes concerning toys set forth in REACH Regulation (EC) 1907/2006 Annex XVII on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. For additional information regarding REACH Regulation please refer to the REACH section of this document.

This product does not qualify as consumer or children's product according to Consumer Product Safety Improvement Act of 2008 (CPSIA). A subsequent amendment to the CPSIA, Pub. L. 112–28 § 2, 122 Stat. 273 (Aug. 12, 2011), specifically exempts ordinary books, paper-based printed materials, and materials similar to paper from the lead testing requirements. In addition, Consumer Product Safety Commission (CPSC) regulation 16 C.F.R. § 1500.91(d) specifically exempts paper-based materials from lead testing, so long as they have not been treated or adulterated in a manner that would cause them to come out of compliance. Manufactures and importers also are excused in *Notice of Requirements to Assess Conformity with the Limits on Phthalates in Children's Toys and Child Care Articles*, 76 Fed. Reg. 49,286, 49,288 n.2 (Aug. 10, 2011); from testing and certifying that there are no phthalates in materials that are known not to contain phthalates, including paper products (paper, paperboard, linerboard and medium, and pulp).

Other heavy metal limits apply to the surface coatings and substrates of children's toys intended for children 13 and under, as set forth in Toy Safety Standard ASTM F963. As this product does not qualify as such, the limits for heavy metals do not apply. However, based on the compliance with Directive 2009/48/EC, the heavy metal content of this product is well below the limits set by CPSIA.

PHARMACEUTICAL PRODUCT PACKAGING

Metsä Board has conducted testing and risk assessment regarding elemental impurities of Class 1 (As, Pb, Cd, Hg) and Class 2A (V, Co, Ni) as classified in ICH Q3D guideline on elemental impurities and identified no such

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level of impurities that would require additional controls for primary or secondary pharmaceutical product packaging.

HIGH TEMPERATURE MIGRATION

Suitability for high temperature applications has been tested by applying the test method EN 1186-13:2002 “Materials and articles in contact with foodstuffs. Plastics. Part 13: Test methods for overall migration at high temperatures” and the test conditions for overall migration from Regulation (EU) 10/2011 covering high temperature applications (120 minutes in 175 ºC / 356 °F). Migration in the aforementioned conditions to the food simulant poly(2,6-diphenylphenylene oxide) is below 10 mg/dm^2 paperboard.

These migration results apply only to unprinted paperboard and functional barrier is recommended at high temperature applications. Please be aware it is the end user’s responsibility to ensure the suitability of the food contact article in the intended conditions of use.

RISK MANAGEMENT

Metsä Board products are manufactured from fresh fibres and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils. Metsä Board evaluates all used raw materials and conducts internal risk assessment based on the supplier information.

All products are regularly tested by independent third party laboratories for food contact suitability and for globally recognized substances of very high concern, such as heavy metals. Routine and more specialised analyses are done in an internal research centre, where also new testing methods are developed.

Metsä Board performs worst case migration calculations for all products and conducts testing as necessary. For example for PE coated paperboards migration testing is conducted according to Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food even though it is not mandatory for the final multi-material multi-layer materials and articles.

As paperboard has no harmonised measures for food contact testing in the EU, Metsä Board has additionally tested its paperboards for suitability for high temperature applications according to the Regulation (EU) No 10/2011. Based on the worst case calculations and test results, the migration of substances into food in applicable conditions is below the legal or recommended limit values for all Metsä Board paperboard products. Therefore the cumulative daily intake can also be estimated to be on an acceptable level.

Metsä Board systematically follows relevant global product safety concerns and reacts accordingly. Our personnel attends trainings regularly in order to maintain up-to-date knowledge on possible safety risks. Metsä Board follows the standardised risk management and food safety (ISO/FSSC 22000) principles.

MATERIAL CIRCULATION

PACKAGING AND PACKAGING WASTE (EU)
We hereby warrant that this product is in compliance with the requirements of Directive 94/62/EC and its amendments.

PACKAGING AND PACKAGING WASTE (USA)
We hereby warrant that this product is in compliance with the requirements of TPCH (CONEG The Model Toxics in Packaging Legislation).

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REQUIREMENTS FOR PACKAGING AND PACKAGING WASTE (EU & USA)

EN 13427 Requirements for the use of European standards in the field of packaging and packaging waste **ISO 18601 General requirements for the use of ISO standards in the field of packaging and the environment**	The procedures and record keeping enabling this declaration are part of Metsä Board's ISO 9001 and ISO 14001 management systems.
EN 13428 Requirements specific to manufacturing and composition. Prevention by source reduction **ISO 18602 Optimization of the packaging system**	During past few years Metsä Board has been able to reduce the weight of its products without compromising the important strength performance characteristics of the packaging. Reduction of the material weight is an important step towards the minimization of the packaging waste.
CR 13695-1 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment – Part 1: Requirements for measuring and verifying the four heavy metals present in packaging **TPCH (CONEG) Certification / The Model Toxics in Packaging Legislation (USA)**	Concentrations of four named heavy metals are clearly below the regulated limits.
CEN/TR 13695-2 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment. Part 2: Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment. **ISO 18602 Optimization of the packaging system**	Concentration of substances classified as hazardous is much less than 1% of the product weight. Substances and mixtures classified as very* hazardous have not been used as raw materials in this product. **Very hazardous means the following classifications according to CLP Regulation (EC) No 1272/2008: Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2), Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic environment (Acute 1 or Chronic 1) and Hazardous to ozone layer Cat. 1.*
EN 13429 Reuse	Not applicable. Packaging made of this product is not foreseen to be refilled or used for the same purpose for which it was conceived.
EN 13430 Requirements for packaging recoverable by material recycling **ISO 18604 Material recycling**	This product has been manufactured using fresh fibres and chemicals which are compatible with known, relevant and industrially available paper recycling technologies in the EU.
EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value **ISO 18605 Energy recovery**	This product is suitable for energy recovery, as it is composed of much more than 50% of organic content.
EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging **ISO 18606 Organic recycling**	This product is industrially compostable according to EN 13432, ISO 18606 and ASTM D 6400. DIN CERTCO certificate numbers: Äänekoski mill – 7W0344 Husum mill – 7W0370

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ASTM D 6400:2012-1 Standard Specification for Labeling of Plastics Designed to be Aerobically Composted in Municipal or Industrial Facilities	Kemi mill – 7W0343 Kyro mill – 7W0351 Simpele mill – 7W0350 Tako mill – 7W0356 BPI certificate numbers: Äänekoski mill – 20201214-03 Husum mill – 20201214-02 Kyro mill – 20201214-04

RECYCLABILITY (USA)

This product is capable of being recycled, whether as part of an industrial recycling program or curbside recycling available to consumers. The U.S. Federal Trade Commission, however, restricts claims of recyclability if recycling of a given material is not available to a “substantial majority of consumers or communities,” which means at least 60% of consumers or communities have access to recycling. 73% and at least 50% of U.S. communities have access to recycling programs for unbleached and bleached paperboard, respectively. Community access rates for unbleached and bleached paperboard include both coated and uncoated paperboard products under these categories. Recycling rates can vary by a variety of factors. Thus, recycling facilities for bleached paperboard may not exist in your area.

This product is made of fresh fibres originating form Nothern European forests. The pulp types used are high brightness BCTMP (Bleached chemi-thermomechanical pulp), chemical pulp (Kraft) and in some cases mechanical pulp. Metsä Board produces BCTMP at Kaskinen and Joutseno mills, Finland, by using modern own-patented technology. The bleached chemical pulp is made in Metsä Group mills in Sweden and Finland. The product specific compositions are listed in the Product composition table below. More information available in product specifications and paper profiles of each product.

Product composition table:

Product name	Brightness top %	BCTMP %	Chemical pulp %	Mechanical pulp %	Pigments and fillers %	Binders %	Moisture %
MetsäBoard Natural FBB	82	54	32		3.2	3.9	7.8
MetsäBoard Natural FSB Cup	82	25	61		1.8	3.7	8.5
MetsäBoard Natural WKL	75		84		7	1	8
MetsäBoard Natural WKL Bright	86		79.5		9.5	3.5	7.5
MetsäBoard Classic FBB (SIM)	84	16.2	24.7	36.5	10.6	3.7	8.3
MetsäBoard Classic WKL	79		81		11	1	7
MetsäBoard Pro FBB Bright (HUS)	91	46	30		12.1	5.1	6.9
MetsäBoard Pro FBB OBAfree	85	49	29		10.2	4.7	7.1
MetsäBoard Pro FSB Cup	85	23	56		8.6	4.4	7.8
MetsäBoard Pro WKL	82		78		13	2	7
MetsäBoard Prime FBB Bright	91.5	51.1	22.1		13.3	5	8.5
MetsäBoard Prime FBB EB	85	50.1	25.1		12.4	4.9	7.5
MetsäBoard Prime WKL	82-85		75		17	2	6

Accordingly, Metsä Board recyclability claims are limited to the Metsä Board’s products, and do not apply to any final package made from them. We recommend that our customers ensure they have adequate substantiation to support any claims of recyclability or other environmental performance with respect to their specific packaging configuration.

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DISCLAIMER

The information provided in this statement applies only for the paperboard, barrier coated paperboard or pulp material as delivered by Metsä Board Corporation and may not substitute necessary end use testing. Metsä Board Corporation shall not be liable for any damage or injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use.

The information given in this statement has been verified by Metsä Board Corporation at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available.

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METSÄ BOARD CORPORATION

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