

**Dr. Ralph Derra**

Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

12 May 2023

Dr. Dr/Be-pf

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

59482 U 23

für  
for  
pour

Prado Cartolinas da Lousã, S.A  
Penedo - Apartado 1  
3200-901 Lousã  
Portugal

Produkt  
Product  
Produit

CLK

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

It was examined by us under 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 26.02.2015,

(BfR-"Collection of methods for the examination of paper and board for food contact" of the, current state), in connection with the BfR guideline "Examination of the transfer of substances from consumer products made of paper and board", as of 26.02.2015),

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 board grade was examined according to the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

and to the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

for the heavy metal content.

Moreover, the transfer of certain elements were examined according to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021.

In addition, primary aromatic amines and non-approved dyes were determined according to the

DIN EN 71, part 10 "Safety of Toys, Organic chemical compounds – Sample preparation and extraction", state of March 2006,

and to the

DIN EN 71, part 11 "Safety of Toys, Organic chemical compounds – Methods of analysis", state of January 2006.

The board 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 2 Absatz 6 des Gesetzes vom 20. Dezember 2022 (BGBl. I S. 2752), §§ 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 2 paragraph 6 of the act of 20 December 2022 (BGBl. I p. 2752), §§ 30 and 31),

and is approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

Furthermore, the board grade is also in compliance with the demands of the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

regarding the heavy metal content.

Moreover, the board grade is in compliance with the demands of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of June 2021,

regarding the migration of certain elements.

Moreover, it complies with the demands of the

DIN EN 71, part 9 "Safety of Toys, Organic chemical compounds – Requirements", state of September 2007,

regarding primary aromatic amines and non-approved dyes.

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

This certificate of compliance has a validity of 2 years and consists of 4 pages.  
It was subsequently amended on 23 June 2023.

Certification decision



The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.

Österreichisch anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
Lebensmittelrechtliche Unbedenklichkeit

(Behrendt)  
Officially certified  
and authorized food  
chemist



**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 Aschaffenburg Chamber of Industry and Commerce.

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

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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A file sample of the tested material is kept at the expert's office.  
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