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Declaration of Compliance

Product Name: Algro Design Duo

Product Description: Solid bleached cartonboard

1. General Information

Pulp composition

Algro Design Duo is produced with a mixture of elementary and totally chlorine free bleached cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that *Algro Design Duo* is produced without intentional addition of any recycled materials.

Acid content/Chloride content

The pH of *Algro Design Duo* measured according to ISO 6588-1:2012-11 is between 8-10. Therefore, *Algro Design Duo* can be described as alkaline. It has not been tested for chloride content.

Storing and handling recommendations

Under appropriate storage conditions the functionality of *Algro Design Duo* is guaranteed for 12 months after supply. Appropriate storage conditions are defined as storage of the supplied reels and sheets in original packaging protected against direct sun light at an average climate (± 10 %) of 23°C, 50 % rel. humidity. Especially high storage temperatures, high ambient humidity and direct UV radiation should be avoided. In case of differences between storage climate and the ambient conditions during conversion the reels and sheets must be stored at least 24 h in original packaging, preferably 48 h near the conversion machine to make sure that the reels and sheets adopt the ambient temperature. This also holds for paper reels just supplied because temperature differences over the web width and running length might negatively affect the conversion process. To avoid the buildup of rope marks and creases, as well as flatness deviations (in case of sheets) by moisture exchange with the environment, the original packaging, especially under humid climate conditions, should only be removed immediately before conversion. Also opened reels have to be appropriately repacked with a moisture barrier packaging.

Producing mill

Algro Design Duo is produced at Maastricht mill.

2. Food Contact Status

Conditions for food contact

Algro Design Duo can be used as food contact material. It can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry foodstuff. Furthermore, contact can be made with such fatty foodstuffs which were assigned to a correction factor of at least 3 according to Annex III, table 2 of Commission Regulation EU 10/2011.

Compliance with (EU) No 1935/2004

Algro Design Duo complies with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. *Algro Design Duo* can be applied as packaging for foodstuffs.

Compliance with (EC) No 2023/2006

Algro Design Duo was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. The producing mill has implemented a quality management system according to ISO 9001 as well as a hygiene management system. Both are externally certified.

Compliance with BfR recommendation XXXVI

Algro Design Duo has been found to be in compliance with the requirements set in ***Bundesinstitut für Risikobewertung (BfR) Recommendation XXXVI***. *„Papier, Kartons und Pappen für den Lebensmittelkontakt“ (Paper and board for food contact).*

Compliance with Foodstuffs and Animal Feed Code (LFGB)

Algro Design Duo is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

Compliance with Italian legislation DM 21.3.73

Algro Design Duo has not been assessed for compliance with Ministerial Decree of 21 March 1973.

Compliance with FDA requirements for food packaging

Algro Design Duo is in compliance with the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (version of April 2024), §§ 176.170 and 176.180.

Compliance with the Swiss Ordinance on food packaging materials

Algro Design Duo fulfills the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

Compliance with (EU) No 10/2011

Algro Design Duo is not within the scope *Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food*, as it is not plastic. *Algro Design Duo* might contain substances subject to a SML according to this regulation. Based on the information given by our raw material suppliers, worst-case calculations are performed to determine the content of respective SML substances in *Algro Design Duo*. Based on this calculated content, the SML limits for each substance (or substance group) migrating in the foodstuff are kept, if a food contact material/food ratio of 13 dm2/kg is considered.

Amendments up to and until 21 February 2025 (Commission Regulation (EU) 2025/351) have been considered.

3. Toy Safety

Toy safety EN 71/3

Algro Design Duo has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3: "Migration of certain elements".

4. Relevant legislation

Compliance with EC 1907/2006 (REACH)

EC 1907/2006 (REACH) primarily addresses chemical substances and preparations. From the perspective of REACH paper is considered as an article. Registration or notification requirements only apply for articles if the certain criteria are met. This is not the case for above mentioned product, that is why registration or notification requirements under REACH cannot be applied. None of the substances listed in the ECHA Candidate List of Substances of Very High Concern, updated on 4th of February 2026, are intentionally used in the formulation or during the manufacturing process of above mentioned product in a content > 0,1%. We further confirm the compliance with Article 33 of EC 1907/2006 about the duty to communicate information on substances in articles.

Compliance with Regulation (EU) 2025/40 (PPWR)

Article 5(4) – Regulation (EU) 2025/40 (PPWR), minimization of substances of concern(heavy metals):
Algro Design Duo complies with the heavy metal requirements set out in Article 5.4 of Regulation (EU) 2025/40 (PPWR).

Article 5(5) – Regulation (EU) 2025/40 (PPWR), substances of concern (PFAS / Total Fluorine):
PFAS are not intentionally added in the manufacturing process of *Algro Design Duo*. Sappi paper grades were analyzed according to the testing approach recommended in the guidance for Article 5(5) of Regulation (EU) 2025/40 (PPWR). Based on the obtained test results, *Algro Design Duo* complies with the requirements set out in Article 5(5) of Regulation (EU) 2025/40 (PPWR).

Article 6 – Regulation (EU) 2025/40 (PPWR), recyclability:
The recyclability of *Algro Design Duo* has been proven. The requirements set in EN 13430:2004 (Requirements for packaging recoverable by material recycling) are met.

The data reflects compliance with Regulation (EU) 2025/40 (PPWR), including Article 5(4) (heavy metals), Article 5(5) (substances of concern / PFAS), and Article 6 (recyclability), as applicable. Representative samples from each mill and/or each brand family have been selected, tested and cross-referenced. This information is valid for paper products delivered by Sappi mills, prior to any further converting processes.

CONEG

Algro Design Duo is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals Cr(VI), Pb, Cd, Hg is below 100 ppm.

EN 13427

In case *Algro Design Duo* is used as part of a packaging material, the following statements regarding the EN 13427 et seqq. may serve as the input for the producer of the finished packaging.

- EN 13427: This standard specifies requirements and a procedure by which a person or organization responsible for placing packaging or packed product on the market may combine the application of the following packaging standards.
- EN 13428: *Algro Design Duo* is made without the use of waste paper. The usage of hazardous chemicals during production has been minimized. The sum of content of the heavy metals lead (Pb), cadmium (Cd), mercury (Hg) and chromium (VI) (Cr(VI)) in *Algro Design Duo* is below 100 ppm.
- EN 13429: This is not directly applicable to *Algro Design Duo* and depends on the properties of the finished packaging.
- EN 13430: *Algro Design Duo* is fully recyclable and comply with the criteria of this standard regarding material recycling. We advise and encourage all users of our papers to recycle our papers after use.
- EN 13431: *Algro Design Duo* will contribute a positive calorific value for a thermal energy recovery process. We however recommend favoring material recycling over incineration.
- EN 13432: *Algro Design Duo* has not been tested on the requirements of this clause. We recommend favoring material recycling over composting.

Compliance with Directive 2011/65/EU (RoHS)

The EU-directive 2011/65/EC on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 are not applicable to *Algro Design Duo*.

Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of the above mentioned product. Updates until and including December 5th, 2025 have been considered.

5. Miscellaneous

Animal testing

The production facilities for *Algro Design Duo* does neither conduct nor commission animal testing with *Algro Design Duo*. Our suppliers confirmed that they neither conduct nor commission animal testing with their products at all or commission animal testing only as a part of a toxicological evaluation to ensure safety and regulatory compliance of the respective products. The suppliers who are concerned confirmed that they are continuosly looking for in-vitro alternatives being accepted by legal authorities in order to actively minimize testing on animals.

BSE/TSE risk

Raw materials of animal origin classified as risk materials according to COMMISSION REGULATION (EC) No 1326/2001, Annex III, are not used during the manufacture of *Algro Design Duo*. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex I 3. of EU 722/2012 are applied.

Halal/Kosher

The presence of traces of substances of animal origin in *Algro Design Duo* cannot be fully excluded. Neither *Algro Design Duo* nor the producing mills have been assessed or certified as Kosher or Halal.

Substances of animal origin

The presence of traces of substances of animal origin in *Algro Design Duo* cannot be fully excluded.

6. Information on end-of-life scenarios

Recyclability

The above mentioned product is fully recyclable in the waste paper stream. *Algro Design Duo* has not been tested for its repulpability properties, but to the best of our knowledge about *Algro Design Duo* composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 21 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

Biodegradability

The above mentioned product has not been tested on biodegradability or compostability. Based on knowledge on product composition and raw materials, we do not see significant restrictions in its biodegradability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes. Due to its alkali properties the paper would even improve compost as it buffers soil acidification, a common challenge in agriculture. Our papers do contain fossil polymer binders. Information on product composition is available on Paper Profiles. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

7. Non-use and use of specific substances or materials

Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of *Algro Design Duo*.

MOSH/MOAH (mineral oil)

MOSH/MOAH is not intentionally added as a paper raw material in the manufacture of *Algro Design Duo*.

Radioactive substances/Radiation

During the production of above mentioned paper grade no radioactive substances are intentionally added. X-Ray measuring devices are installed in our paper machines in order to measure parameters like ash content and coating weight online. The ionizing effect of these measurements on the paper web can be considered to be negligible.

Nanomaterials

Raw materials, such as calcium carbonate, containing particles with one or more external dimensions in the nano range may be used in the manufacturing process of the above mentioned product. These particles would meet the definition of nanoparticles according to Commission Recommendation of 10 June 2022. The presence of these particles in the respective raw materials arises from a naturally occurring and/or technically unavoidable particle number-based size distribution. These particles are embedded in the paper matrix and are not anticipated to undergo migration.

Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of *Algro Design Duo*, except for wheat starch, which may be added and in turn contains gluten. *Algro Design Duo* therefore may contain less than 20 ppm gluten. According to the standard CXS 118-1979, dietary foods with less than 20 mg/kg are considered gluten-free foods. Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.

Persistent organic pollutants

None of the following substances listed in the annexes of the Stockholm Convention (last updated 2025) have been intentionally added during production of this product:

Annex A (Elimination)

- Aldrin
- Chlordane
- Chlordecone
- Chlorpyrifos
- Decabromodiphenyl ether (commercial mixture, c-decaBDE)
- Dechlorane Plus
- Dicofol
- Dieldrin
- Endrin
- Heptachlor
- Hexabromobiphenyl
- Hexabromocyclododecane (HBCDD)
- Hexabromodiphenyl ether and heptabromodiphenyl ether
- Hexachlorobenzene (HCB)
- Hexaclorobutadiene (HCBD)
- Alpha hexachlorocyclohexane
- Beta hexachlorocyclohexane
- Lindane
- Long-chain perfluorocarboxylic acids, their salts and related compounds
- Medium-chain chlorinated paraffins (MCCPs)
- Methoxychlor
- Mirex
- Pentachlorobenzene
- Pentachlorophenol and its salts and esters
- Polychlorinated biphenyls (PCBs)
- Polychlorinated naphtalenes
- Perfluorooctanic acid (PFOA), its salts and PFOA-related compounds
- Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds
- Short-chain chlorinated paraffins (SCCPs)
- Technical endosulfan and its related isomers
- Tetrabromodiphenyl ether and pentabromodiphenyl ether
- Toxaphene
- UV-328

Annex B (Restriction)

- DDT
- Perfluorooctane sulfonic acid (PFOS), its salts and perfluorooctane sulfonyl fluoride (PFOSF)

Annex C (Unintentional production)

- Hexachlorobenzene (HCB)
- Hexaclorobutadiene
- Pentachlorobenzene
- Polychlorinated biphenyls (PCBs)

-Polychlorinated dibenzo-*p*-dioxins (PCDD)
-Polychlorinated dibenzofurans (PCDF)
-Polychlorinated naphtalenes

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of *Algro Design Duo*. The amendments up to and including 22th July 2024 (EU) 2024/2570 have been considered.

Ozone depleting substances

Substances listed in Montreal Protocol 1987 and in European regulation (EU) 2024/590 are not intentionally added during the production of *Algro Design Duo*.

Titanium oxides

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of *Algro Design Duo* formulation and they are not expected to be present in *Algro Design Duo*.

Optical brightening agents

Optical brightening agents (OBAs) are intentionally used during the manufacture of *Algro Design Duo*. These substances are used in accordance with respective BfR recommendations and FDA legislation.

PVDC

Polyvinylidene chloride (PVDC) is not addded to the manufacturing process of the above mentioned product.

Sulfur

As far as it concerns content of sulfur species, the above mentioned product is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered ‘reducible sulfur species’ according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of ‘Reducible sulfur species’ according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

Conflict minerals

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of *Algro Design Duo*.

CMR Substances according to CLP legislation

During the production of *Algro Design Duo*, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

Residual solvents

Based on our knowledge on the manufacturing process and the raw materials used in the above mentioned product, we expect no residual solvents to be present in the final product.

Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of *Algro Design Duo*:

-Acetone (CAS 67-64-1)
-Alkylphenols and their ethoxylates
-Anthraquinone (CAS 84-65-1)
-Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
-Asbestos
-Azodicarbonamide (CAS 123-77-3)
-BAC (CAS 63449-41-2)

-BADGE, BFDGE, NOGE
-Benzene (CAS 71-43-2)
-Benzophenones
-Benzyl alcohol (CAS 100-51-6)
-Bisphenols
-Cadmium, lead, mercury, chromium and compounds thereof
-Chlorine and other halogens (Fluorine, Bromine, Iodine)
-Cholecalciferol (CAS 67-97-0)
-Cobalt and its compounds
-Creosote
-Cyanuric acid (CAS 108-80-5)
-DDAC (CAS 7173-51-5)
-Diisopropylnaphtalenes (DIPNs)
-Dimethylfumarate (CAS 624-49-7)
-Dioxane (CAS 123-91-1)
-Disodium guanylate (CAS 5550-12-9)
-Epoxy resins
-Epoxidised Soybean Oil (ESBO)
-Ethanol (CAS 64-17-5)
-Ethylene oxide (75-21-8)
-Formaldehyde
-Glyphosate (CAS 107-83-6)
-Glycol ethers
-GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
-Hexane (CAS 110-54-3)
-Inosinate (CAS 4691-65-0)
-Isobornyl Acrylate (CAS 5888-33-5)
-Isopropyl alcohol (IPA) (CAS 67-63-0)
-Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
-Mancozeb (CAS 8018-01-7)
-Melamine (CAS 108-78-1)
-Micas
-Monosodium glutamate (CAS 142-47-2)
-Natural rubber latex materials
-N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
-Nitrosamines, Nitrites, Nitrates
-Nitrocellulose
-N-Methylpyrrolidone (NMP) (CAS 872-50-4)
-4-Nonylphenol (4-NP) (CAS 3050-88-2)
-Nonylphenolethoxylate (NPE, CAS 127087-87-0)
-Organic Peroxides
-Organotin compounds
-Orthophenylphenol (CAS 90-43-7)
-Partially hydrogenated terphenyls (HTPs)
-Pentachlorophenol (PCP)
-Pentanedione-2,4-titanium
-Perchlorates
-Pesticides and Fungicides
-Phenylalanin, Phenylamine
-Phthalates
-Polybrominated biphenyls
-Polycyclic aromatic hydrocarbons (PAHs)
-Polyvinylchloride (PVC)
-Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)

-Radioactive materials, radioactive contamination
-Rayon
-Resorcinol (CAS No. 108-46-3)
-Rice plant derived substances
-Seed-bearing parts of a flowering plant (fruits)
-Sodium Antimonate A (CAS 15432-85-6)
-TAA Titanium Acetylacetonate (CAS 17501-79-0
-Thiuram (CAS 137-26-8)
-Toluene (CAS 108-88-3)
-Triclosan (CAS 3380-34-5)
-Tris(4-nonylphenyl, branched and linear) phosphite
-2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
-Vinyl chloride (CAS 75-01-4)
-Volatile Organic Compounds
-Yeast
-TNPP, 4 NP and NPE

Bisphenols

We confirm, that Bisphenol A (CAS-No. 80-05-7), as well as other bisphenols and bisphenol derivatives are not intentionally added during the production of our paper grades.Considering articles 3 and 4 of Regulation 2024/3190/EC, we therefore consider *Algro Design Duo* compliant with the regulation.

8. Disclaimer

Disclaimer

This declaration is restricted to the above mentioned product in the state it is delivered by us. This information provided in this statement applies only for the above mentioned product and may not substitute necessary end use testing. Sappi 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 *Algro Design Duo* for a particular application or end use. The information given in this statement has been verified by Sappi 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. Republishing this document is not permitted.