

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

17 December 2020

Dr. Dr/Be-pf

**UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE**eingetragen  
registered no.  
registré

53638 U 20

für  
for  
pourProgroup Board GmbH  
Horstring 12  
76829 Landau  
GermanyProdukt  
Product  
Produit

Progroup Board Corrugated boards

The product manufactured by the company mentioned above is a representative cross-section of the corrugated boards of the production program of Progroup Board GmbH which are used for food packaging.

They were examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

as well as to the specific requirements of the

- 2 -

Guidelines of the Council of Europe on test conditions and methods of analysis for paper and board materials and articles intended to come into contact with foodstuffs, Technical Document no. 2, version 3 of 14 November 2007,

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 corrugated board grades were examined for the heavy metals content 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 requirements of the

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, Official Journal of the European Union L 174/88 of 1 July 2011, last amendment by Directive (EU) 2019/178 of the Commission of 16 November 2018, Official Journal of the European Union L 33/32 of 5 February 2019.

Thus the corrugated board grades are 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, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 97 der Verordnung vom 19. Juni 2020 (BGBl. I S. 1328), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 97 of the decree of 19 June 2020 (BGBl. I p. 1328), §§ 30 and 31),

and are 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 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 222<sup>nd</sup> Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019).



The demands of the

Resolution of the Council of Europe AP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs of 18 September 2002,

and of the

Guidelines of the Council of Europe on paper and board materials and articles, made from recycled fibres, intended to come into contact with foodstuffs, Technical Document no. 3, version 2 of 10 June 2004,

are met by the corrugated board grades. Instead of the not yet evaluated Technical Document 1 on constituents, the list of fabrication additives of the German Recommendation XXXVI was consulted.

Furthermore, they are in compliance with 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,

regarding the heavy metals content and the

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, Official Journal of the European Union L 174/88 of 1 July 2011, last amendment by Directive (EU) 2019/178 of the Commission of 16 November 2018, Official Journal of the European Union L 33/32 of 5 February 2019,

concerning the prohibited contents.

Thus the **Progroup Board Corrugated boards** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty foodstuffs and may also be used for secondary packaging. Foodstuffs with large surfaces may only be packed using an appropriate intermediate packaging according to the annex of Recommendation XXXVI.

The corrugated board grades are not subject to the

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, Official Journal of the European Union L 396 of 30 December 2006, last modified by Commission Regulation (EU) No 1149/2020 of 3 August 2020, Official Journal of the European Union L 252/24 of 4 August 2020,

as the products are no chemicals (substances or preparations) according to the definitions of article 3 but they are articles. Consequently a registration under REACH is not necessary for them.

53638 U 20

Nevertheless it is a duty for a supplier of articles according to article 33 of the Regulation (EC) No. 1907/2006 to provide information about its containing a substance of very high concern in a concentration above 0.1 % weight by weight. As a minimum you have to indicate the name of the substance.

This certificate of compliance has a validity of 2 years and consists of 5 pages.

#### Certification decision



Öffentlich 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

53638 U 20



**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.

---

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.

Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

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

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.