

**Dr. Ralph Derra**

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

5 December 2023

Dr. Dr/Be-pf

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

60947 U 23

für  
for  
pour

Papierfabrik Palm GmbH & Co. KG  
Palm Allee 1  
73432 Aalen  
Germany

Produkt  
Product  
Produit

Wellenstoff  
Testliner

The corrugated base papers manufactured by the company mentioned above are used for the manufacture of corrugated board used for food packaging.

They were 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),

as well as of the Council of Europe's

Technical guide on paper and board used in food contact materials and articles, as of 2021,

and according to the demands of the

Warenwetbesluit verpakkingen en gebruiksartikelen (Warenwet), Staatsblad 420 of 30 May 2005, last amendment by resolution of 17 April 2012, Staatsblad 193 of 17 April 2012,

as well as of the Italian

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last amended on 25 November 2022.

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 heavy metals contents were determined in line 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,

as well as with the

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

and the migration of various elements was analysed according to the

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

Moreover, the absence of not approved amines and colorants was examined in line with the

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

and with the

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

The corrugated base papers 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, 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 are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neugefasst 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).

The demands of the

Council of Europe Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food of 7 October 2020, sections 3.1 and 3.3,

as well as of the supplementary

Technical guide on paper and board used in food contact materials and articles, as of 2021, are met by the corrugated base papers.

Furthermore, they meet the analytical demands of the

Warenwetbesluit verpakkingen en gebruiksartikelen (Warenwet), Staatsblad 420 of 30 May 2005, last amendment by resolution of 17 April 2012, Staatsblad 193 of 17 April 2012,

and of the Italian

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Art. 38-bis, last amended on 25 November 2022.

Furthermore, the corrugated base papers are 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,

and of the

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

with regard to the heavy metals contents.

The requirements of the

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

as well as of the

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

are kept by the corrugated base papers.

Furthermore, the production of the corrugated base papers complies with

Commission Regulation (EC) No. 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, Official Journal of the European Union no. L 384/75 of 29 December 2006, last amendment of 27 March 2008 by the Commission Regulation (EC) No 282/2008.

Third party documents were used for this evaluation.

In addition, the paper grades are resistant to perspiration and saliva.

Thus the papers for corrugated board **Wellenstoff** and **Testliner** according to the sample material submitted may be used safely according to the intended purpose. The finished products manufactured with them may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

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

Certification decision



wissenschaftlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Papp,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
Lebensmittelspezifische Unbedenklichkeit

  
(Behrendt)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 5.  
La traduction des estampilles est donnée en page 5.



**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 Chamber of Industry and Commerce.

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

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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