

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

7 August 2025

Dr. Dr/Be-do

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

65206 U 25

für  
for  
pourPapeteries Palm S.A.S.  
Avenue Monseigneur Roméro – BP 19  
37160 Descartes Cedex  
FranceProdukt  
Product  
ProduitTestliner  
Cannelure

The products manufactured by the company mentioned above are paper grades which are used for food packaging.

They were examined by us in 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 28.09.2023,

(BfR "Collection of methods for the examination of paper and board for food contact", current status, in connection with the BfR guideline "Testing of substance transfers from consumer articles made of paper, cardboard and paperboard", as of 28 September 2023),

as well as of the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Allegato II, sezione 4 e Allegato IV, 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.

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Additionally, analyses according to the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of February 2025, category III,

as well as for organic chemical compounds applicable for paper according to the

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

and the

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

were carried out.

Furthermore, the paper grades were tested for limited heavy metals according to the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5,

as well as to the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

The paper 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, 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 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 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 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and conform to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu-gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 227. Mitteilung, Bundesgesundheitsblatt 67 (2024) 968-970, Stand vom 01.08.2024,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 227<sup>th</sup> Announcement, Bundesgesundheitsblatt 67 (2024) 968-970, as of 1 August 2024).

In addition, the paper grades keep to the analytical requirements of the

Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, Allegato II, sezione 4 e Allegato IV, last amended on 14 November 2019,

and of the

Regeling van de Minister van Volksgezondheid, Welzijn van 14 maart 2014, kenmerk 328583-117560-VGP, houdende vaststelling van de Warenwetregeling verpakkingen en gebruiksartikelen die in contact komen met levensmiddelen (Warenwetregeling verpakkingen en gebruiksartikelen), Staatscourant 2014 Nr. 8531 van 27 maart 2014, last amendment by Regeling van de Minister van Volksgezondheid, Welzijn en Sport van 26 april 2022, kenmerk 3348384-1027396-VGP, Staatscourant 2022 Nr. 11934 vom 29 April 2022.

The requirements of the

DIN EN 71, part 3 "Safety of Toys, Migration of Certain Elements", state of February 2025, category III,

as well as of the

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

for the toy material "paper" are also observed by the paper grades.

With regard to the content of heavy metals, they also meet the

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, Official Journal of the European Union L, 2025/40, 22.1.2025, Article 5,

as well as the

Model Toxics in Packaging Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modified in February 2021.

Thus, the paper grades **Testliner** and **Cannelure** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty and such kinds of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging.

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

Certification decision



staatlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappe,  
Kunststoffen, Glas, Metallblech und  
sonstigen Metallverpackungen auf ihre  
Unschadlichkeit für die Lebensmittel

(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 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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