

Declaration of Compliance to food contact regulations

It is hereby confirmed that **UPM ForMi GP20, GP30, GP40, GP50** comply with the requirements of:

- European Parliament and Council Regulation (EC) 1935/2004/EC
- Commission Regulation (EU) N:o 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food as amended.
- 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 (GMP).
- US Food and Drug Administration (FDA) Title 21 Code of Federal Regulations (CFR, 2011 Edition) as applicable.
- Bundesinstitut für Risikobewertung (BfR) recommendations no. XXXVI, 1-3 (2009)

Raw materials of UPM ForMi

UPM ForMi is a compound made with main raw materials of wood based bleached cellulose fibre (CAS 9004-34-6) and polypropylene (CAS 9010-79-1) thermoplastics.

The UPM ForMi products contain only approved raw materials and UPM requires the relevant Declaration of Compliances from its raw material suppliers. Only virgin raw materials are used in the UPM ForMi products.

Compliance with EU regulations

All raw materials comply with the EC and EU regulations mentioned above. The monomers and additives used in the manufacturing of the plastics raw materials used in UPM ForMi contain compounds regulated (EU) 10/2011 with specific migration limit (cis-1,2-cyclohexane-dicarboxylic acid, calcium salt). Component with this compound is used in compliance with the restrictions regarding specific migration limit.

Monomers and additives contain "dual use"-compounds. "Dual use"-compounds are approved as direct food additives and they might be present as additives in the components of above mentioned products

Compliance with US FDA

Monomers and additives used for the manufacturing of the above mentioned products are complying with Title 21 CFR 177.1520 olefin polymers, 175.105 adhesives and 178.2010 antioxidants and/or stabilizers for polymers. Pulp used for the manufacturing of the above mentioned products are complying with 21 CFR 170-189, particularly 186.1673 pulp.

UPM ForMi migration tests

Materials have been tested for contact with all kinds of food types with food simulants water, 3% acetic acid, 10% ethanol and olive oil to long term storing in room temperature and for high temperature applications up to the 121°C in test conditions of 2 hours in 100°C continued with 10 days in 40°C. Tested conditions included hot filling and reheating (max 121°C), frozen and refrigerated conditions. Storage time in room temperature is not intended to exceed 30 days, when combined with high temperature conditions. Organoleptic characteristics are tested with food simulants water and milk chocolate, which represents the most critical food simulants to modifications to the flavor in all types of foods.

Applicability of UPM ForMi

Based on the test results, the above mentioned products are in compliance with EU and US FDA regulations and are suitable as food contact material for all type of food under the following conditions: freezer and refrigerator, room temperature and high temperature applications up to the 121°C (2 hours in 100°C continued with 10 days in 40°C). Conditions include hot filling and reheating (max 121°C). Storage time in room temperature is not intended to exceed 30 days, when combined with high temperature conditions.

Compliance with the overall and specific migration limits as described above must be measured from the final application intended to come into contact with food by using real food or appropriate food simulants at the intended and foreseeable conditions. It is the responsibility of the converter or food packer to verify that the final application complies with the requirements as set out by the applicable legislation.

Prepared by

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Disclaimer clause

The legislation cited above applies to the final packaging which is intended to come or is brought into contact with foodstuff. This declaration of compliance is, however, restricted only to the UPM ForMi product as it leaves production.

This declaration of compliance is not intended and should not be construed as a warranty or representation of any kind for which UPM would assume legal responsibility. Without anyway limiting the abovementioned, UPM gives no warranties or makes no representations as to the merchantability or fitness for a particular purpose of ForMi products and it is the customer's responsibility to verify compliance with applicable legislation of the final packaging under actual, planned and foreseeable conditions of use.

No liability shall be accepted in respect of the use of UPM's products in conjunction with other materials. The information contained herein relates exclusively to UPM ForMi products when not used in conjunction with any third party materials.

All terms and conditions regarding the supply of UPM ForMi products by UPM shall be subject General Sales Terms of UPM-Kymmene Group for UPM granulate products.