



**UPM**

The Biofore  
Company

## Declaration of Compliance

UPM Kymi pulp mill.

Products: UPM Betula, UPM Conifer

The pulp grades under product names listed above in this declaration ("Products") are tested for suitability as raw materials of food contact materials and sanitary products and compliance with regulations referred to below. Based on the analysis of an independent laboratory, VTT Expert Services Ltd., Finland (Ref. VTT-S-01893-17/2, VTT-S-01893-17/3 ) and Centre Testing International Group Co, Ltd, China the **Product(s)**:

1. With respect to their chemical and organoleptic properties are suitable for raw material of all kinds of paper or board based food packaging in contact with dry and non-fatty foods as well as moist and fatty foods including cooking papers, hot filter papers, filter layers, baking paper or board and absorber pads for food packaging.

2. Comply with the relevant requirements of

- European Parliament and Council Regulation (EC) 1935/2004
- Bundesinstitut für Risikobewertung (BfR) recommendation XXXVI/1-3
- Law concerning revisions of the foodstuffs and animal feed legislation (LFGB) of updated version 24th October, 2016, §§ 30 and 31, Germany
- US FDA regulation CFR, Title 21, §186.1673 "Pulp"
- Chinese standard GB 4806.8- 2016 – food contact paper, paper board and paper articles
- Chinese standard GB 4806.1-2016 – general safety requirements of food contact materials and articles

3. Have been manufactured in accordance with Commission Regulation (EC) No 2023/2006 in Good Manufacturing Practice and with ISO 22000 management standard.

4. Are made of virgin cellulose fibres. Raw materials for UPM Betula pulps are birch wood (*Betula pendula*, *Betula pubescens*) and aspen (*Populus tremula*). For UPM Conifer pulps raw materials are pine and spruce (*Pinus sylvestris*, *Picea abies*).

5. Chemical pulp fibres and additives are approved according to:

- The German recommendation XXXVI, /1-3 of Bundesinstitute für Risikobewertung (BfR)
- USA regulations of FDA, 21 CFR, parts 170 – 189
- GB 9685-2016 – use of additives in food contact materials and articles

6. Are tested for suitability for toy and packaging applications and comply with regulations:

- EN 71-3:2013 Safety of Toys. Migration of certain elements
- ASTM F963-96a Standard Consumer Safety Specification on Toy Safety
- EC 94/62 directive on packaging and packaging waste and its amendments
- CONEG, Toxics in Packaging Legislation, USA

7. Are compliant with BfR guidelines for sanitary and personal sanitary products according to Bundesgesundheitsbl. 39 (1996) 123 and 124

8. Can contain traces of sodium sulphate (E514). UPM Betula pulps can contain also talc (magnesium silicate, E553a, E553b). Sodium sulphate and talc are so called dual-use additives as they can be used also as direct food additives
9. No surface biocides are used in any of UPM pulps
10. Hygiene and quality of all UPM pulps must be ensured during storage and transportation. Warehouses and vehicles must be clean and dry. Pls. see [UPM Cargo Handling Manual](#) for advice and detailed requirements.

**Disclaimer**

It is end user's responsibility to verify the suitability of the final packaging product for its end use, e.g. food contact and toy packaging use. UPM-Kymmene Oyj or its subsidiaries shall not be liable for any damage or injury resulting from the use of the products. Please also acknowledge that information provided in the declaration is partly based on our suppliers' information which we will not be responsible for, no third party may rely on the information set out herein and the declaration is given on the basis of the existing knowledge and applicable regulation on the date of issuance. Please acknowledge that the declaration is not intended to provide additional warranty for the products and it is subject to the limitations on liability set out in the supply agreement including the applicable general sales terms for pulp products between UPM or its subsidiaries and the customer in question.



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23.01.2018, Niklas Keskinen, Product Manager, UPM Pulp