



UPM

The Biofore
Company

27.09.2018

ORGANISATION
CERTIFIED BY
Inspecta

ISO 22000

UPM Product safety profile

UPM Specialty Papers ENA

Production site: Tervasaari mill

Product name(s): UPM Brilliant™ Biocoat

SAFETY INFORMATION

No known health or environmental hazards. Paper is defined as an article, not a substance or a mixture. The products aren't classified hazardous according to Global Harmonized System (GHS). In case of fire: Water or powder can be used for extinguishing.

PRODUCT SAFETY MANAGEMENT

- Certified quality management system ISO 9001 at the mill
- Certified environmental management system ISO 14001 at the mill
- Certified food safety management system ISO 22000 at the mill
- UPM Restricted Chemical Substances List (UPM RSL) in place

DECLARATION OF COMPLIANCE

The paper grade(s) listed in this declaration are tested for suitability for food contact and their compliance with food contact regulations is confirmed by an independent laboratory, VTT Expert Services Ltd, Finland (VTT-S-01668-16/8).

On respect of their chemical and organoleptic properties these grades are suitable for contact with dry and non-fatty foods as well as moist and fatty foods at temperatures up 90 °C.

The paper grade(s) comply with the relevant requirements of Regulation 1935/2004 and Law concerning revisions of the foodstuffs and animal feed legislation of updated version 26th January 2016, §§ 30 and 31, Germany. The paper grade(s) have been manufactured in accordance with Commission Regulation (EC) No 2023/2006 in Good Manufacturing Practice and with ISO 22000 management standard.

The paper grades are made of primary fibres and additives approved according to*:

- The German recommendation XXXVI of Bundesinstitute für Risikobewertung (BfR)
- 21 CFR 176.180 Components of paper and paperboard in contact with dry food
- 21 CFR 176.170 Components of paper and paperboard in contact with moist and fatty food

*) Urea-glyoxal oligomer in use that may not fulfill BfR XXXVI or 21 CFR 176.170 requirements.

In addition to food contact, the paper grade(s) are suitable to be used in toy and packaging applications. The paper grade(s) comply with regulations:

- EN 71-3:2013 Safety of Toys. Migration of certain elements
- EN 71-9:2013 Safety of Toys. Organic chemical compounds
- ASTM F963-96a Standard Consumer Safety Specification on Toy Safety (USA)
- EC 94/62 directive on packaging and packaging waste and its amendments
- CONEG, Toxics in packaging legislation, USA

STATEMENT

The products are tested for suitability for food contact and compliance with food contact regulations in Europe and in USA. Pls. note that between EU countries there is principle of mutual recognition in place. The products are suitable for use in toys and in connection with electrical devices. The products are manufactured to be compliant with packaging material and packaging waste requirements.

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The products are compliant with the following regulations (substances not intentionally added)*.

| UPM RSL –list, section1: Substances that shall not be used in UPM products | | | |
|--|--|--------------|--|
| | Regulation | | |
| 1** | REACH / Regulation 1907/2006/EC Annex XVII or Annex XIV | 9 | Indicative list of substances controlled under Regulation (EC) No 1005/2009 04 February 2011 |
| 2** | Candidate List of Substances of Very High Concern (SVHC) for Authorization | 10 | Persistent Organic Pollutants (POPs): Regulation (EC) No 850/2004 and amending Directive 79/117/EEC, Stockholm Convention, UNEP 12 chemicals |
| 3 | EC No. 1272/2008 Classification, Labelling and Packaging of Substances and Mixtures: CMR-substances on category 1 and 2. | 11 | OSPAR: The list of chemicals for priority action, Part A |
| 4 | Brominated flame retardants: Directive 2003/11/EC restricting use of pentabromodiphenyl ether & octabromodiphenyl ether | 12 | HELCOM Recommendation 31E/1, Appendix 2 |
| 5 | RoHS 2 Directive 2015/863/EC | 13 | California Proposition 65 |
| 6 | Perfluorooctane sulfonates (PFOS and PFOS-related chemicals) and/or perfluorooctane acid (PFOA) and/or its salts: Directive 2006/122/EC | 14 | Bisphenols: 4,4'-(propane-2,2-diyl)diphenol (Bisphenol A) CAS 80-05-7, 4,4'-sulfonyldiphenol (Bisphenol S) CAS 80-09-1 or 2,2-Bis(4-hydroxyphenyl)butane (Bisphenol B) CAS 77-40-7 |
| 7 | Triclosan: 2,4,4'-trichloro-2'-hydroxydiphenyl ether CAS3380-34-5, EU Commission Decision of 19 March 2010 under Directive 2002/72/EC | 15** | Phthalates (DEHP, DBP, BBP, DINP, DIDP, DnOP): EC 552/2009 (items 51&52) amending Annex XVII of REACH Regulation EC 1907/2006. Phthalates on toys and childcare products and US Consumer Product Safety Improvement Act, Section 108 |
| 8 | Ozone depleting substances: Montreal protocol and EU Directive 2037/2000/EC | 16* * | Priority Substances in the field of water policy: EU Directive 2013/39/EC, Finnish National regulations Chapter D and 40 CFR Part 423 Appendix A Water priority chemicals |
| UPM RSL –list, section 2: Restricted substances. Based on our knowledge and procedures following substances or materials haven't been used in UPM Tervasaari products. | | | |
| 17** | Biocidal active substances as defined by Biocidal Products Regulation (BPR, Regulation EU No 528/2012). Only approved biocidal active substances or active substances under EU review program can be used as slimicides or preservatives in paper making raw materials or additives. | 21 | Global Automotive Declarable Substance List (GADSL), Plastics Division. |
| 18 | Allergens: Directive 2007/68/EC Annex III a | 22 | "Conflict minerals": Dodd-Frank Act A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. |
| 19 | ChemSec "SIN List" | 20 | International Electrochemical Commission Standard (IEC) 62474 material declaration list |
| * = Pls. contact productstewardship@upm.com for possible exceptions ** = Legal requirement applying on pulp, paper or plywood production in EU countries | | | |

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 of, no third party may rely on the information set out herein and declaration is given on the basis of the existing knowledge and applicable regulation on the date of issuance. Please acknowledge that declaration is not intended to provide additional warranty for the products and it is subject to limitations on liability set out in the supply agreement including UPM's general sales terms for the paper products between UPM or its subsidiaries and the customer in question.

27.09.2018, Mikko Rissanen, Director, Bus. Development, UPM Specialty Papers ENA