

08 January 2026

Regulatory Compliance

Products: **Billerud Flute®**
Production site: **Billerud Sweden AB Gruvön Mill**

Food contact

The product is suitable for contact with foods in accordance with the below listed paragraphs and restrictions.

The product is manufactured from virgin fibres with addition of chemicals that meet the demands in FDA and BfR and also in accordance with good manufacturing practice.

Under normal, applicable and foreseeable conditions of use, the product does not transfer any constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics thereof. The above-mentioned product has been tested according to the proposed methods in the respective regulations and recommendations.

The product complies with the applicable paragraphs in:

- Regulation (EC) No 1935/2004 with amendments on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 with amendments on good manufacturing practice for materials and articles intended to come into contact with food
- The German Food Law §§ 30 und 31 in der Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (LFGB)
- BfR, Recommendation XXXVI (October 1st, 2025), Paper or paperboard which is intended to be used at temperatures up to 90°C (holding and reheating of food)
 - Compliant for all foodstuffs.
- FDA Code of Federal Regulation Title 21, Chapter 1, §176.170, §176.180 (April 1st, 2025), Components of paper and paperboard in contact with aqueous, fatty and dry foods
 - Conditions of use: C as described within 21 CFR §176.170 (c), Table 2.
 - All food types except for infant formula and human milk.
 - Conditions of use: E-G as described within 21 CFR §176.170 (c), Table 2.
 - All food types.
 - As Billerud does not manufacture the finished paper/board product, we need to notify you that our product may contain chemicals listed in paragraph (b) and as such the final paper/board product must be tested in accordance with paragraph (c) of 21 CFR §176.170.



General recommendation

For packing of aqueous and fatty products we recommend a suitable barrier to avoid the food to affect the physical properties of the product.

Packaging and Packaging Waste

The product complies with Packaging and Packaging Waste Directive 94/62/EC with amendments. This directive defines requirements for the manufacturing and composition of packaging and prescribes fulfilment of essential requirements. This can be fulfilled by the use of harmonized EN standards. Directive 94/62 is still in force. Regulation 2025/40 will come stepwise into force and replace Directive 94/62/EC.

The product complies with The Packaging and Packaging Waste Directive 94/62/EC (PPWD) and The Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR) on Heavy metals. The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium is well below 100 parts per million by weight.

Regarding Article 5(5) on per- and polyfluoroalkyl substances (PFAS) in Regulation (EU) 2025/40, this demand comes in force August 12, 2026. No PFAS is intentionally added and the total fluor content is expected to be below 50 mg/kg in the product. It is still not defined how to fulfill the demand in Article 5(5) on PFAS but we follow the development on this.

The level of substances classified as hazardous to the environment is less than 0.1% and minimized (standard CR 13695-2). The products are suited for energy recovery (EN 13431) and for material recycling (EN13430).

REACH

We comply with the requirements/obligations of REACH, Regulation (EC) No 1907/2006 with amendments. We are mainly a Downstream User of chemicals, which means that our suppliers are responsible for the registration of the chemicals that we purchase. Substances and Intermediates produced at our pulp mills are registered.

Our fibre based products are defined as articles according to REACH.

Based on information from our suppliers we state that no SVHC substances listed in the "Candidate List of Substances of Very High Concern" from the European Chemicals Agency are present in concentrations above 0.1% in our products. Nor do we intentionally add substances listed in Annex XIV during the manufacturing process.

Disclaimer

The information provided in this declaration is provided based on our actual knowledge about the product and its components. Billerud assumes no responsibility for any deviations from this information which is due to facts or circumstances beyond our actual knowledge about the product and its components.

The product is sold without any express or implied warranty as regards fitness for any specific purpose of use. It is the user's responsibility to satisfy themselves as to the paper's suitability for the particular purpose(s) for which the user intends to use the paper and to obtain all necessary information for such assessment. It is the customer's responsibility to assure the appropriate, safe and legal use and handling of our products.



The information in this declaration is subject to the limitations of liability and other applicable provisions set forth in general trade rules or any other separate written agreement governing the sale and purchase of products between Billerud and the addressee of this declaration.

This statement is valid from date of signing until further notice, however not longer than until 2026-12-31

Grums, Billerud Sweden AB Gruvön Mill
Quality & Environment

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