

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

2 June 2020

Dr. Dr/Is-har

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

52249 U 20

für  
for  
pourPrivate Joint-Stock Company  
"Kyiv Cardboard and Paper Mill"  
130, Kyivska Str.  
Obukhiv, Kiev Region, 08700  
UkraineProdukt  
Product  
ProduitDivoEco  
DivoPack

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

They were examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

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as well as to the specific requirements of the

Guidelines of the Council of Europe on test conditions and methods of analysis for paper and board materials and articles intended to come into contact with foodstuffs, Technical Document no. 2, version 3 of 14 November 2007,

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

Furthermore, a determination was performed for the heavy metal contents based on the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as on the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008.

The board 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, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3,

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuch (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 28 des Gesetzes vom 20. November 2019 (BGBl. I S. 1626), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 28 of the act of 20 November 2019 (BGBl. I p. 1626), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 222. Mitteilung, Bundesgesundheitsblatt 62 (2019) 1546, Stand vom 01.06.2019,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 222<sup>nd</sup> Announcement, Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019).



The demands of the

Resolution of the Council of Europe AP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs of 18 September 2002,

and of the

Guidelines of the Council of Europe on paper and board materials and articles, made from recycled fibres, intended to come into contact with foodstuffs, Technical Document no. 3, version 2 of 10 June 2004,

are met by the board grades. Instead of the not yet evaluated Technical Document 1 on constituents, the list of fabrication additives of the German Recommendation XXXVI was consulted.

Furthermore, the board grades meet the requirements of the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008

regarding the heavy metal contents.

Thus the board grades **DivoEco** and **DivoPack** according to the sample material submitted may be used safely for food packaging. They may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. Dry, non-fatty foodstuffs with large surfaces may be packed by using an appropriate intermediate packaging.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



Staatlich anerkannter Sachverständiger zur Untersuchung der Gegenproben von Verpackungsmitteln aus Papier, Papp, Kunststoffen, Glas, Weißblech und sonstigen Metallverpackungen auf ihre ~~schadstofftechnische~~ Unbedenklichkeit.

(Höfert)  
Officially certified and authorized food chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**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 Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, assermenté par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

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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