

Akkreditiert gemäß  
DIN EN ISO / IEC 17025  
DIN EN 45011

**DACH**  
DAC-PL-0035-97-20  
DAC-ZE-002-08

DR. RALPH DERRA

Öffentlich bestellter und vereidigter  
Sachverständiger für Verpackungs-  
materialien, Boden- und Luftanalysen



**ISEGA – Forschungs-  
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Aschaffenburg**



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18 June 2010  
Dr. Dr/hs-ba

**UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE**

eingetragen  
registered no.  
registré 29887 U 10

für Firma  
for Messrs  
pour MM  
Papeteries de Raon S.A.  
Rue Émile Zola  
88110 Raon L'Étape  
France

Produkt  
Product  
Produit  
Mafoline

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappen für Lebensmittelverpackungen", Stand 2000, 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 2000, 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),

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 sensory analysis was performed.

The paper grade is 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 No. 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 no. 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 24. Juli 2009 (BGBl. I S. 2205), zuletzt geändert durch Artikel 1 der Verordnung vom 03. August 2009 (BGBl. I S. 2630), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 24 Juli 2009 (BGBl. I p. 2205), last amendment by article 1 of the law of 3 August 2009 (BGBl. I p. 2630), §§ 30 and 31),

and is approved according to the

Deutsche Empfehlung XXXVI zur gesundheitlichen Beurteilung von Materialien und Gegenständen für den Lebensmittelkontakt im Rahmen des Lebensmittel- und Futtermittelgesetzbuches, 34. Mitteilung, Bundesgesundheitsblatt 10, 14 (1967), einschließlich 211. Mitteilung, Bundesgesundheitsblatt 52, 1114 (2009), Stand vom 1.6.2009,

(German Recommendation XXXVI for the health-related evaluation of materials and objects for the contact with foodstuffs in the frame of the Foodstuffs and Animal Feed Code, 34<sup>th</sup> memorandum, Bundesgesundheitsblatt 10, 14 (1967), including the 211<sup>th</sup> memorandum, Bundesgesundheitsblatt 52, 1114 (2009), state of 1 June 2009).

The demands of the

Resolution of the Council of Europe AP (2002) 1 on paper and board used in food contact applications of 17 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 paper grade. Instead of the not yet evaluated Technical Document 1 on constituents, the list of fabrication additives of the German Recommendation XXXVI was consulted.

Moreover, the paper grade is approved according to the requirements of the

Décret n° 92-631 du 8 juillet 1992 relatif aux matériaux et objets destinés à entrer en contact avec les denrées, produits et boissons pour l'alimentation de l'homme ou des animaux, état du 20 janvier 1994,

(Verordnung Nr. 92-631 vom 08.07.1992 über Materialien und Objekte, welche dazu bestimmt sind, mit Lebensmitteln, Erzeugnissen und Getränken für die Ernährung von Menschen oder Tieren in Kontakt zu kommen, Stand vom 20.01.1994).

Furthermore, the paper grade Mafoline meets the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2009 edition), § 176.180.

Thus the paper grade Mafoline according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging.

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

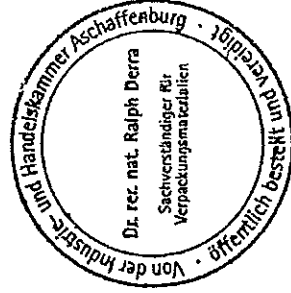
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(Burkardt)  
Officially certified  
and authorized food  
chemist

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

29887 U 10



**Staatlich anerkannter Sachverständiger zur Untersuchung der Gegenproben von Verpackungsmitteln aus Papier, Pappe, Kunststoffen, Glas, Weißblech und sonstigen Metallverpackungen auf ihre lebensmittelrechtliche Unbedenklichkeit**

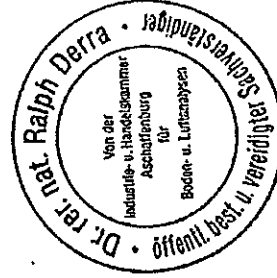
Dr. Ralph Derra

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 control 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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Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
 A file sample of the tested material is kept at the expert's office.  
 Réserve du matériel analysé est gardée au bureau de l'expert.



**BIO-TOX**

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Sécurité Produits et Environnement  
[www.bio-tox.fr](http://www.bio-tox.fr)

**Daniel Ribera**

PhD, HDR, Eurotox registered Toxicologist  
Expert on food safety and food contact materials  
Former Chairman of the CES-MCDA (ANSES - F)

To

**Monsieur Pascal Gallaire**  
Papeterie de Raon  
F-88110 Raon l'Étape

N/ref. 101023 MAFOLINE/GB

**Subject: Ability to enter into contact with foodstuffs of MAFOLINE**

The Raon paper mill manufactures and commercializes " MAFOLINE " papers at Raon l'Étape in the Vosges (F-88110).

These papers are intended to come into contact with foodstuffs.

They are made of recycled fibers and can be used alone or combined with a functional barrier. They are designed for any type of contact (dry, aqueous, fat).

The manufacturing is carried out under quality assurance as attested by an ISO-9001-version-2000 certification. A traceability system is operational concerning all raw materials; either recovered paper bales (according to standard EN/NF 643) or other inputs (certificates of compliance for food contact are available).

Production is regularly controlled to ensure compliance with the European, French, German and North American regulations and recommendations.

These controls concern the composition of the paper:

- Regular research for contaminants listed either in the French information memorandum (note d'information 2004/64 de la Répression des Fraudes) or in the German BfR recommendation n°XXXVI;
- A daily "fingerprint" (gas chromatography coupled to mass spectrometry) informing on the cytotoxicity of the material;
- Routine analyses for cytotoxic and genotoxic potential.

Analytical searches are carried out by the technical centre of paper in France and the Isega laboratories in Germany. These analyses concern: PCB, PCP, DCP, 3MCPD, DCHB, heavy metals, brighteners, phthalates, diisopropyl/naphthalene, benzophenones, Michler's ketone, Bisphenol A, PAHs, primary aromatic amines, formaldehyde, glyoxal and volatile compounds. They are completed by the determination of antimicrobial activities and organoleptic properties and, recently, by the search for mineral oils. They are carried out both on extracts and migrants.

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Serl au capital de 9000 €, SIRET 444 722 797 000 32 –TVA intracommunautaire : FR 42 444 722 797

101023 MAFOLINE/GB

The cytotoxic potential of the paper is measured (1) on human HepG2 cell line at DERTECH-Packtox laboratories (Institut National Supérieur – Agrosup, Dijon) and (2) on human HeLa cell line at the Centre for research and control of Paris (CRECEP).

The genotoxic potential is analyzed at the Institut Pasteur de Lille by mean of the human lymphocytes micronucleus test and gene mutation test on *Salmonella typhimurium* assays.

All analyses and study reports concerning the genotoxicity and cytotoxicity were provided for analysis.

The results of the production control plan and traceability were also submitted.

As a result, it is established that " MAFOLINE " papers, produced according to a proven traceability and under quality assurance are able to enter into contact with foodstuffs.

Talence, Octobre the 23<sup>th</sup> 2010



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#### References

- Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1. April 2008 edition), § 176.180.
- Dossier DOCCRF Matériaux au contact des denrées alimentaires: papiers et cartons. actualisé en octobre 2007 ([http://www.economie.gouv.fr/directions\\_services/dgccrf/secureite/produits\\_alimentaires/materiaux\\_contact/papiers\\_cartons.htm](http://www.economie.gouv.fr/directions_services/dgccrf/secureite/produits_alimentaires/materiaux_contact/papiers_cartons.htm))
- German Recommendation XXXVI for the health-related evaluation of materials and objects for the contact with foodstuffs in the frame of the Foodstuffs and Animal Feed Code, 34th memorandum, Bundesgesundheitsblatt 10, 14 (1967), including the 210th memorandum, Bundesgesundheitsblatt 50, 1470 (2007), state of 1. June 2007).
- 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
- Règlement (CE) No 1935/2004 du Parlement Européen et du Conseil du 27 octobre 2004 concernant les matériaux et objets destinés à entrer en contact avec des denrées alimentaires et abrogeant les directives 80/590/CEE et 89/109/CEE
- Resolution of the Council of Europe AP (2002) 1 on paper and board used in food contact applications of 17 September 2002,