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Declaration of Compliance Baking Paper, 39 g/m²

Grammage(s):

39 g/m²

Certified Management Systems and certificates of the production of the raw paper:

- ISO 9001
- ISO 14001
- ISO 50001
- ISO 45001
- ISO 22000
- BRC-CP
- IFS-HPC
- PEFC/FSC (COC standards)
- SEDEX

The paper fulfil criteria of:

- Kosher (with passover)
- Halal
- Nordic Swan
- OK Compost Home
- OK Compost Industrial

Food contact – Declaration of Compliance:

We hereby state that this product is in compliance with the following global food contact laws and recommendations. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations, taking also into consideration the declarations of compliance provided by our raw materials suppliers and additional information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

EU and EEA	
Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	Complies when applicable and under foreseeable conditions of use
Germany	
Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs, and Animal Feed Code – LFGB), $\$$ 30 and 31	Complies when applicable and under foreseeable conditions of use

BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact	Complies when applicable and under foreseeable conditions of use
BfR XXXVI/2. Paper and Board for Baking Purposes	For dry, non-fatty and fatty foods for food packaging as well as for baking and cooking purposes in microwaves and conventional ovens at temperatures of up to 220°C.
Italy	
Decreto Ministeriale 21 marzo 1973 Disciplinab igienica degli imballaggi, recipienti, utensili, destinati a venire in contatto con le sostanze alimentari o con sostanze d'uso personale	All food types
France	
Fiche MCDA n°4 (V02 01/01/2019). Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires	All food types
USA	
The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 ("Components of paper and paperboard in contact with aqueous and fatty foods") and 176.180 ("Components of paper and paperboard in contact with dry food")	All food types, excluding infant formula and breast milk, under FDA's Conditions of Use A ("High temperature heat-sterilized (e.g., over 212 °F)") through H ("Frozen or refrigerated: Readyprepared foods intended to be reheated in container at time of use")
China	
GB 9685-2016 Hygienic Standards for Uses of Additives in Food Containers and Packaging Materials	All additives used in the manufacture of the product are listed in GB9685-2016 or subsequent MOH Announcements for the appropriate use
GB 4806.8-2016 Food-Contact Use Paper and Paperboard Materials and Articles	Complies when applicable and under foreseeable conditions of use
GB 4806.1-2016 General Safety Requirements for Food-Contact Materials and Articles	Complies when applicable and under foreseeable conditions of use
Mercosur	
GMC No. 40/15 Technical Regulation on cellulosic materials, packaging and equipment intended to come into contact with food	Complies when applicable and under foreseeable conditions of use.
GMC No. 42/15 Technical Regulation on cellulosic materials, packaging and equipment intended to come into contact with food during cooking or heating in oven	Complies when applicable and under foreseeable conditions of use.

Dual use substances:

Substances	E code	CAS no.	
Sorbic acid	E200	110-44-1	< 0,006 %
Sorbitan monostearate	E491	1338-41-6	< 0,00004 %
Polyethylene glycol sorbitan monostearate	E433	9005-65-6	< 0,00002 %
Xanthan gum	E415	11135-66-2	< 0,00001 %
Colloidal silica	E551	7631-86-9	< 0,05 %

Typical Applications

Baking and Cooking paper is intended to be used for applications in conventional ovens, microwave ovens and drying pans (one time use). Additionally, the paper is suitable for food preservation in room temperature, and in refrigerators and freezers.

Temperature guide:

Appliance	Temperatur range	Experienced usage time
Freezer	-300 °C	12 months
Refridgerator	+4+7 °C	2 months
Room	+15+30 ℃	According to food type; Dry foods up to 12 months
Conventional oven		If at least 80 % of paper is covered by food, then:

	+220 °C +200 °C +180 °C +150 °C +60+100 °C < +60 °C	30 min 60 min 120 min 4 hours 12 hours 24 hours
Microwave oven	max +150 ℃	30 min
Frying pan Contact grill Merrychef® Turbochef®	up to +300 ℃*	10 min provided that at least 80 % of paper is covered by food.

*see also Chapter ,Heat resistance and ignition -risk assessment'

Reusability:

Baking and Cooking papers are basically designed for a one-time use, so it is within our responsibility to ensure this. Nevertheless, it can be generally used several times depending on a variety of parameters, like e.g. baking temperature, baking time, humidity of baking food, coverage area.

As a producer, we are not able to influence the further handling of the paper. Fat, food remains and other soiling have a considerable influence on the re-usability (on the heat resistance as well as the release functionality). As we have no knowledge of these factors and cannot influence them, the re-usability of the papers is under the customers' responsibility.

Particularly with regard to hygienic aspects we generally advise not to re-use the paper.

Heat resistance/Ignition:

For best product safety, the European laws are following the German recommendation BFR XXXVI/2. It prescribes a temperature of 220°C. To comply with valid food regulations maximum temperature of 220°C is printed on cases in most countries, where it is not legal to market baking papers with higher temperatures.

It is possible for manufacturers to demonstrate suitability for use in food contact at temperatures up to 250 °C in Nordic countries, Denmark, Finland, Norway and Sweden, by conducting a risk assessment.

For the risk assessment, we identified two types of risks:

A) a risk of fire or physical degradation and

B) a risk of being non-inert in contact with food simulants. The assessment is carried out by conducting relevant tests with representative samples.

Testing of physical heat resistance and ignition of baking paper

Heat resistance of paper was measured with and without baking goods. As a result, we got the confirmation that our baking and cooking papers can stand baking processes up to 300°C for 10 minutes under following condition: baking paper must be covered at least with 90% baking goods. Uncovered (plain) paper on tin tends to get brown under high temperatures. It is getting brittle as well but it does not start burning.

Burning paper in household or professional ovens is based on faulty application from user's side (dirty oven, contact with heating elements). Therefore, any contact of the paper with the heating elements and side walls shall be avoided. And care about a clean device (free from greasy residues).

Migration testing of baking paper at high temperatures

In order to assess the risk of migration of harmful substances from paper to food, several migration studies have been made from our product in an independent laboratory, including:

Туре	Food simulant	Temperature	Time	Result
Overall	10 % ethanol	at reflux	4 h	< 10 mg/dm²
Overall	3% acetic acid	100°C	4 h	< 10 mg/dm²
Overall	olive oil	225°C	2 h	< 10 mg/dm²
Overall	MPPO (tenax)	250°C	30 min	< 10 mg/dm²
Specific (BPA)	10 % ethanol 3%acetic acid olive oil	at reflux 100°C 175°C	8 h 8 h 2 h	not detectable not detectable not detectable
Specific (PAA)	3% acetic acid	100°C	8 h	not detectable
Specific (Hg, Pb)	3% acetic acid	100°C	8 h	Lead: < 0,01 mg/kg Mercury: not detectable

Barrier properties:

The products are highly refined papers with good/ excellent/ premium greaseproofness (depending on grade) according to DIN 53116.

Our papers have in general a low air permeability.

Mineral oil:

This product is manufactured from fresh fibres and does not contain any printed recycled material. Mineral oils are not used as raw materials in the manufacturing of this product. All used production chemicals and additives are approved for food contact.

Non-Use warranty:

We hereby warrant that the producer does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

Recycled material	The product(s) is manufactured from virgin materials and does not contain any recycled materials.
Chlorine	Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF.
Fluorine	We do not use in the manufacturing process of the product any fluorinated chemicals or per- and polyfluoralkyl substances ("PFAS"), such as perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid and its derivatives (PFOS).
Heavy metals	No heavy metals are intentionally added during the manufacturing process. Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in • Directive 94/62/EC on Packaging and Packaging Waste and its Amendments
Genetically modified organisms (GMO)	No GMO based raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.
Animal origin	No raw materials of animal origin are used in the manufacturing of the product.

Epoxy derivates	2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis (2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.
California Propositions 65	Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.
POP Regulation and brominated flame retardants	Substances listed in the Regulation (EC) No 2019/1021 on persistent Organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).
We do not use	AnthraquinoneAzocolourants and azodyes as defined in Annex XVII of REACHBenzophenone and hydroxybenzophenoneBisphenolsFormaldehydeGlutenIsopropylthioxanthone (ITX)Melamine4-methyl-benzophenone (4-mbp)Mono and diglycerides of fatty acidsNatural rubber latex materialsOptical brightenersPhthalatesPolycarbonatePolychlorinated biphenyls (PCBs)Styrene
Allergens	We hereby warrant that substances or products causing allergies or intolerances listed in Regulation (EU) No 1169/2011 Annex II and in the Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA, U.S.A.) are not used as raw materials in the manufacturing process of the product(s). This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin, molluscs and sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/l in terms of the total SO2 which are to be calculated for products as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers.

Circular Economy:

The product(s) disintegrate according to EN 13432. For testing, the paper mill has selected products that were presumed to be the most resistant for biodegradation. Biodegradability has also been tested; nearly 80 % of material biodegrade in 152 days in the home compostability test, where the temperature was 25°C. The biodegradability test for industrial compostability is typically carried out at the emperature of 58 $^{\circ}$ C, where degradation occurs more rapidly.

The toxicity to earth worms was tested by independent laboratory according to the ASTM E 1676 method of the compost generated in the disintegration test. The results showed that when the product broke down in the compost, there were no residues or degradation products that would adversely affect the viability and average weight of earth worms.

The greaseproof papers can be recycled as paper according to the standards: material recycling EN 13430 and energy recovery EN 13431 (see more information below). Used or polluted papers can be disposed together with food waste in dedicated containers, which will be forwarded to composting or biogas plants. All our papers could be sent for thermal recovery as well.

Packaging and packaging waste: EU directive 94/62/EC

We hereby warrant the product(s) is/are in compliance with the requirements of Directive 94/62/EC and its amendment 2004/12/EC. When used as packaging material this conformity is specified as following:

EN 13427 Requirements for the use of European standards in the field of packaging and packaging waste	The procedures and record keeping enabling this declaration are part of the ISO 9001 and ISO 14001 management systems.
ISO 18601 General requirements for the use of ISO standards in the field of packaging and the environment	
CR 13695-1 Requirements for measuring and verifying the four heavy metals and other dangerous substances present in packaging and their release into the environment – Part 1: Requirements for measuring and verifying the four heavy metals present in packaging	Concentrations of four named heavy metals are clearly below the regulated limits.
CONEG Certification / The Model Toxics in Packaging Legislation (USA)	
CEN/TR 13695-2 Requirements for measuring and verifying the four Heavy metals and other dangerous substances present in packaging and their release into the environment. Part 2: Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment.	Concentration of substances classified as hazardous is much less than 1 % of the product weight. Substances and mixtures classified as very* hazardous have not been used as raw materials in this product. *Very hazardous means the following classes of the Global Harmonized System (GHS): Carcinogenicity (Cat. 1A, 1B and 2), Acute toxicity (Cat 1 or 2), Mutagenicity (Cat 1A, 1B and 2), Reproductive toxicity (Cat 1A, 1B and 2), Hazardous to the aquatic environment (Acute 1 or Chronic 1) and Hazardous to ozone layer Cat. 1.
EN 13430 Requirements for packaging recoverable by material recycling	If not used, this product is suitable for material recovery as it is compatible with the known, relevant and industrially available paper recycling technologies in the EU.
EN 13431 Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value	Product(s) are certified for use of the 'OK Compost Industrial' and 'OK Compost Home' conformity marks. See the Chapter 'Circular economy'.
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EN 13432 Requirements for packaging recoverable through composting biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging	See ne Unapter Urcular economy
ISO 18606 Organic recycling	

Reach:

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used in the manufacture of the paper products.

The paper products comply with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

According to REACH Regulation chemical and article suppliers are required to inform downstream users regarding the presence of substances listed on the Candidate List of Substances of Very High Concern (SVHC) for Authorisation above the reporting limit. Based on this information the paper products do not contain Substances of Very High Concern above the reporting limit of 0,1%.

Disclaimer:

The information provided in this statement applies only for the greaseproof products as delivered by Brangs + Heinrich and may not substitute necessary end use testing. Brangs + Heinrich shall not be liable for any damage or

injury resulting from misuse or uninstructed use of its products. This statement shall not be regarded as a warranty of fitness for particular purpose or end use. The end users shall have responsibility for verifying the suitability of the product for a particular application or end use.