



KAPSTONE PAPER AND PACKAGING CORPORATION

1101 Skokie Blvd. - Suite 300 Northbrook, IL 60062-4124
847-239-8800

**Declaration of Compliance with Regulations on Materials and Articles
Intended to Come into Contact with Food**

Manufacturing Site(s) and address(es): **KapStone Charleston Kraft LLC**

5600 Virginia Avenue, North Charleston, SC 29406, USA

Product(s): **Kraftpak folding carton stock**

I hereby declare that the material and/or article listed above has been manufactured in accordance with the following regulations and reference texts:

- Regulation (EC) No 1935/2004 of 27th October 2004 on material and articles intended to come in contact with food and repealing Directives 80/590/EEC and 89/109/EEC;
- Regulation (EC) No 2023/2006 of 22nd December 2006 amended on good manufacturing practices for materials and articles intended to come in contact with food;
- Foodstuffs and Animal Feed Code – LFGB – in the version of 3 June 2013;
- 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 including the most recent updates and amendments;
- Code of Federal Regulations, Food and Drugs (FDA), 21 CFR 176.170 and 176.180 (See Table I);
- Directive 94/62/EC of the European Parliament and 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 2013/2/EU of the Commission of 7 February 2013, Official Journal of the European Union L 37/10 of 8 February 2013;
- Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008;

In addition,

- The compliance is understood to be subject to the conformity with conditions of storage, handling and use, taking into account the specific characteristics of the material or article and the conditions such as prescribed by professional practices or codes.
- In the event of a change in the packaged product, its composition or its intended use, as well as in the event of a change in the conditions for using the material or the article, the customer for whom this declaration is intended must ensure the compatibility packaging/content for which the customer then accepts responsibility.



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This product won't bring about, in accordance with Regulation (EC) No 1935/2004, under normal or foreseeable conditions of use, an unacceptable change in the composition or deterioration in the organoleptic characteristics of the food content.

This declaration of compliance has been established on:

- Declaration(s) by suppliers of raw materials;
- Periodic testing by an accredited laboratory;
- Calculation and modeling analysis

This declaration of compliance is valid as long as the material composition has not changed, its destination has not changed and in absence of regulatory changes.

This declaration is established in accordance with article 16 of Regulation (EC) No 1935/2004 for materials and articles that come into contact with food.

Thus the board grade Kraftpak may be used safely for food packaging. It may stand in direct contact with dry, moist and fatty foodstuffs.

Date of issue: September 28, 2018

The signature of Donna D. Jarrell in cursive script, followed by the KapStone logo consisting of the stylized 'K' and the word 'KAPSTONE' in bold, sans-serif font.

Donna D. Jarrell / Director, Product Stewardship

KapStone Paper and Packaging Corporation

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TABLE 1

The product listed above may be used for following:

Packaging for all Food Types: I, II, III, IV, V, VIA, VIB, VII, VIII, IX (Ref. 21 CFR 176.170, Table 1)

Conditions of Use: A through J (Ref. 21 CFR 176.170, Table 2)

- Condition of Use A - (High temperature heat-sterilized (e.g., over 212° F));
- Condition of Use B - (Boiling water sterilized);
- Condition of Use C - (Hot filled or pasteurized above 150° F);
- Condition of Use D - (Hot filled or pasteurized below 150° F);
- Condition of Use E - (Room temperature filled and stored (no thermal treatment in the container));
- Condition of Use F - (Refrigerated storage (no thermal treatment in the container));
- Condition of Use G - (Frozen storage (no thermal treatment in the container)); and
- Condition of Use H - (Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use- includes microwave and conventional oven applications)
- Condition of Use I – Irradiation, according to the FDA guidelines under 21 CFR179.45 (b), kraft paper is an approved packaging material for food contact during irradiation up to a maximum dose of 0.5 kGy.
- Condition of Use J – Cooking at temperatures exceeding 250 °F (this would include 220°C 1 hour) See **Note** below.

Note: Cellulosic based fibers in paper are known to have an auto-ignition temperature in the range of 218°C to 246°C, this represents only a range and many factors may influence this temperature such as board density, thickness, compositions, barrier coatings/plastics applied, atmospheric oxygen content, containment of the sample (oven size), heating rates, materials such as foods or liquids in contact, etc. The auto-ignition temperatures are defined as the temperature measurement under normal atmospheres in which a material may ignite as a result of heat liberation due to an exothermic oxidation reaction in the absence of an external ignition source such as a spark or flame. Integrity of paperboard can also be sacrificed as temperatures are increased due to thermal degradation of the lignocelluloses which usually begins at temperatures lower than the auto-ignition temperature. Degradation will continue if higher temperatures are prolonged. For lignocellulosic paperboard particularly at those temperatures greater than 200°C this can occur with accelerated rates as temperature is increased above this point. Thermal degradation of the lignocellulose will impose a loss in strength properties. Depending on the usage of the board this behavior can vary quite differently based on the aforementioned factors for each application. Since users application are often different, it is KapStone's recommendation that small batches of the proposed application are trialed under actual usage conditions to determine the suitability of the board using the above information only as a guide.