

To: Crokus

PRODUCT SAFETY STATEMENT

Material description GPP SH SAGA PREMIUM41 32,5X53CM/500

Production Site Metsä Greaseproof Papers GmbH
Veldener Str. 121-131
D-52349-Düren
GERMANY

The content of this statement is valid for the Metsä Greaseproof Papers trade name(s) mentioned above.

Metsä Greaseproof Papers of Metsä Tissue is a manufacturer of baking and cooking papers. SAGA, our baking and cooking brand, comprises a wide offering of baking and cooking papers for both professional and household use. All our baking and cooking papers are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Our two production units manufacture baking and cooking papers in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001 and ISO 22000 or BRC.

BAKE AND COOK FAMILY -GRADES

SAGA Onesidebake is one-side siliconized, all other paper grades are siliconized both sides.

SAGA Processbake	Limited release for machine use at industrial food processors, e.g. for pizza doughs, cheese, meat, patties.
SAGA Onebake	Good release for household baking.
SAGA Multibake	Excellent release for most of baking goods for professional use.
SAGA Onesidebake	Good release towards most types of baking goods. Designed for laminating and converting into grilling bags.
SAGA Premiumbake	Premium release for all baking goods including salt pretzels, crisp bread and extremely sticky products. Suitable for use in contact grills.
SAGA Premiumbake ed	Extra dense cooking grade for many food preparation processes in households, restaurants, industrial kitchens; for steam cooking, frying, freezing. Suitable for use in contact grills.
SAGA Premiumbake ws	Wet strong cooking grade for many food preparation processes in households, restaurants, industrial kitchens; for steam cooking, frying, freezing. Suitable for use in contact grills. Supporting the professional cook & chill process.

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Product composition:


- Natural cellulose pulp (91-94%)
- Release coating, elastomer based on aqueous emulsion of polydimethylsiloxane (1-4%)
- Wet strength agent (max 1%)
- Moisture (5 %)

MANAGEMENT SYSTEMS AND CERTIFICATES

	Description	Düren mill	Mänttä mill
Production sites fulfil criteria of:			
ISO 9001	Quality	X	X
ISO 14001	Environment	X	X
ISO 50001	Energy	X	X
ISO 45001	Occupational safety	X	X
BRC-CP	Food safety and hygiene	X	-
IFS-HPC	Food safety and hygiene	X	-
ISO 22000	Food safety and hygiene	-	X
PEFC/FSC (COC standards).	Forest management	X PEFC/04-31-3228 FSC-C154637	X PEFC/02-31-77 FSC-C004147
SEDEX	Ethical supplier	X	X
Products fulfil criteria of:			

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Kosher (with passover)		X	X
Halal		X	X
Nordic Swan	Ecolabel	X	X
OK Compost Home	Compostability	X	X
OK Compost Industrial	Compostability	X	X

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

For use in direct contact with all food types (dry, moist, fatty and non-fatty).

BfR XXXVI/2. Paper and Board for Baking Purposes

For use at temperatures up to 220°C. May stand in direct contact with all food types (dry, moist, fatty and non-fatty).

Italy:

**D.M. 21 March 1973 and amendments;
- D.P.R. 777/82 and amendments;
- D.Lgs. n°29/2017**

All food types

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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: Ready-prepared foods intended to be reheated in container at time of use”), as well as J (“Cooking at temperatures exceeding 250°F”).
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 4806.8-2022 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:

Substance	E code	CAS no.	Concentration in product
Sorbic acid	E200	110-44-1	<0,01%
Sorbitan monostearate	E491	1338-41-6	0,00%
Polyethylene glycol sorbitan monostearate	E433	9005-65-6	0,00%
Xanthan gum	E415	11138-66-2	0,00%
Colloidal silica	E551	7631-86-9	<0,05%
Ammonium sulfate	E517	7783-20-2	<0,04%
Adipic acid	E355	124-04-9	0,00%

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INDUSTRY GUIDELINES AND POLICIES

Metsä Greaseproof Papers complies with the Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles, March 2019. The Guidelines is supported by the European paper and board supply chain: CEPI (paper and board manufacturers); CITPA (paper and board converters); ECMA (carton makers association); ACE (beverage carton alliance); CCB (CEPI Containerboard); FEFCO (corrugated packaging) and ETS (tissue paper association).

TYPICAL APPLICATIONS

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

Temperature guide:

Appliance	Temperature range	Experienced usage time
Freezer	-30...0 °C (-22 ...32°F)	12 months
Refridgerator	+4 ...+7 °C (39...44°F)	2 months
Room	+15 ...+30 °C (59...86°F)	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 (428 °F)	30 min
	+200 °C (392 °F)	60 min
	+180 °C (356 °F)	120 min
	+150 °C (302 °F)	4 hours
	+60...+100 °C (140...212 °F)	12 hours
	< +60 °C (< 140 °F)	24 hours
Air fryer	max +220 °C (428 °F)	max 60 min
Microwave oven	max +150 °C (302 °F)	30 min
Frying pan	up to +300 °C* (572 °F)	10 min provided that at least 80 % of paper is covered by food.
Contact grill		
Merrychef®		
Turbochef®		

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

STORAGE RECOMMENDATIONS

All our papers should be generally stored in their original packaging under following conditions:

- Protected against wind, rain, frost and direct sunlight
- Dry and free from any humidity
- Storage temperature between min 0°C and max 40°C (min 32 F and max 104 F)
- Protected against any kind of pollution or damages
- Storage time: 3 years

For base paper reels use a maximum clamp pressure of 130 bar in order to avoid any damages or deviations.

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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. HACCP-certified enterprises, which are producing according to a defined hygienic standard, are principally just using baking paper once. Herewith they avoid for example cross-contamination and offer a maximum of product safety.

HEAT RESISTANCE AND IGNITION - RISK ASSESSMENT

For best product safety, the European laws are following the German recommendation BFR XXXVI/2. It prescribes a temperature of 220°C (428°F). 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 (482°F) 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 SAGA 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 (572°F) for 10 minutes under following condition: baking paper must be covered at least with 80% 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.

Metsä Greaseproof Papers has also initiated two studies at VTT, Finland (2006 and 2015) about ignition of baking papers. According to this study the paper starts getting brown and brittle very rapidly at a temperature around 250-280°C (482-536°F). However, the actual ignition point, at which the paper catches fire is above 440°C (824°F). The difference between the recommended maximum temperature of 220°C (428°F) and the actual ignition point of >440°C (824°F) is therefore ≈220 °C (396°F), which to our understanding allows a sufficient safety margin, and it is therefore safe to use baking paper in the temperatures up to 250°C (482°F).

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 SAGA 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:

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Type	Food simulant	Temperature	Time	Result
Overall	10 % ethanol	at reflux	4 h	< 7 mg/dm ² ; < 0.5 mg/in ²
Overall	3% acetic acid	100 °C 212 °F	4 h	< 7 mg/dm ² ; < 0.5 mg/in ²
Overall	olive oil	225 °C 437 °F	2h	< 7 mg/dm ² ; < 0.5 mg/in ²
Overall	MPPO (tenax)	250 °C 482 °F	30 min	< 7 mg/dm ² ; < 0.5 mg/in ²
Specific (BPA)	10 % ethanol	at reflux	8 h	not detectable
	3% acetic acid	100 °C/212°F	8 h	not detectable
	olive oil	175 °C/347°F	2 h	not detectable
Specific (PAA)	3% acetic acid	100 °C/212°F	8 h	not detectable
Specific (Hg, Pb)	3% acetic acid	100 °C/212°F	8 h	Lead: < 0,01 mg/kg Mercury: not detectable

No migration above the safety limits were observed. Fluorinated substances, such as perfluorinated alkyl substances (PFAS), optical brighteners and recycled paper are not used as raw materials. Therefore we can conclude that it is safe to use the baking paper in temperatures up to 250°C (482°F).

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.

NANOMATERIALS

We hereby warrant that this product is not defined as a nanomaterial according to the Commission Recommendation on the definition of nanomaterial 2011/696/EU as amended. However, some of the additives that have commonly been used in pulp and paper production processes for centuries contain nanoscale particles. These particles are not classified as dangerous and do not pose a risk to human health.

NON-USE WARRANTY

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We hereby warrant that Metsä Greaseproof Papers 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.
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 <ul style="list-style-type: none"> • 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.
Conflict minerals	Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product. We also hereby declare that raw materials originating from the Democratic Republic of Congo are not used as raw materials and the product fulfils the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
Epoxy derivatives	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 Proposition 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.
Endocrine disrupting chemicals (EDC)	Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 20.10.2022)

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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	Anthraquinone Azocolourants and azodyes as defined in Annex XVII of REACH Benzophenone and hydroxybenzophenone Bisphenols Formaldehyde Gluten Isopropylthioxanthone (ITX) Melamine 4-methyl-benzophenone (4-mbp) Mono and diglycerides of fatty acids Natural rubber latex materials Optical brighteners Phthalates Polycarbonate Polychlorinated 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 and molluscs.

CIRCULAR ECONOMY

Metsä greaseproof papers are technically 100 % recyclable. All grades without wet strength achieved at least Level B recyclability (Aticelca evaluation method 501:2019) in the testing according to the standard UNI 11743:2019. Also, the broke of all grades without wet strength agent are re-used in our own paper-making process.

Product(s) are certified for use of the 'OK Compost Industrial' and 'OK Compost Home' conformity marks. This means that the products fulfill the requirements of EN 13432, and includes biodegradability (tested according to ISO 14855-1). Heavy metals and the fluorine content lay well below the maximum levels as prescribed by the standards EN 13432 (2000), NF T51-800 (2015), ASTM D6868 (2017) and CAN/BNQ 0017-088 (2010). Composting of the product result in compost that is safe for growing plants. Ecotoxicity was not found when investigated according to EN 13432.

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.

Metsä 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.

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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 Metsä Greaseproof Papers' 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. <i>*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.</i>
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	If not used, this product is suitable for energy recovery, as it is composed of much more than 50 % of organic content.
ISO 18605 Energy recovery	
EN 13432 Requirements for packaging recoverable through composting and biodegradation. Test scheme and evaluation criteria for the final acceptance of packaging	Product(s) are certified for use of the 'OK Compost Industrial' and 'OK Compost Home' conformity marks. See the Chapter 'Circular economy'.
ISO 18606 Organic recycling	

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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 Metsä Tissue and Metsä Greaseproof Papers paper products. Metsä Tissue and Metsä Greaseproof Papers are downstream users of chemicals.

Metsä Tissue and Metsä Greaseproof Papers 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 information received from upstream suppliers Metsä Tissue and Metsä Greaseproof Papers 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 tissue products, greaseproof products and traded goods as delivered by Metsä Tissue and Metsä Greaseproof papers and may not substitute necessary end use testing. Metsä Tissue and Metsä Greaseproof papers 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.

The information given in this statement has been verified by Metsä Tissue and/or Metsä greaseproof Papers at the date of its publication and we shall not be liable for any future changes in information, contents, processes, regulatory or legal requirements included in this statement. This statement is valid maximum one year unless a more recently dated version is available.

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METSÄ TISSUE/ METSÄ GREASEPROOF PAPERS

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