

Dear Customer

With this letter we confirm that all our papers comply at least with the following EC norms, EC directives, EC regulations and other related international directives:

EU Regulation 1907/2006, REACH, Registration, Evaluation, Authorisation and Restrictions of Chemicals, all the obligations and requirements as downstream user. In our paper production none of the substances on the candidate list substances of very high concern are added, including those of the most recent update of the European Chemicals Agency (ECHA) date 07/07/2017.

EU directive 94/62/EC (heavy metal content in packaging).

EU directive 2000/53/EC concerning recycling (end of life, automotive industry).

EU directive 2011/65/EU (2002/95/EC and 2003/108/EC), RoHS, Restriction of Hazardous Substances in electrical and electronic equipment.

Heavy metal migration and content according to:

EN 71-3:2014 European safety of toys plastic materials and articles intended to come into contact with food;

EU Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys.

EU Directive 2003/34/EC of the European Parliament and of the Council amending for the 23rd time Council Directive 76/769/EEC relating to restrictions on the marketing and use of certain dangerous substances and preparations (substances classified as carcinogens, mutagens or substances toxic to reproduction - c/m/r).

EU Directive 2006/122/EC, Restrictions to marketing and use of certain dangerous substances and preparations according to (use of perfluorooctane sulfonates)

Health and Safety, foodcontact

BfR empfehlung XXXVI (EU), dry and fatty foodcontact.

FDA 21 CFR 176.180, dry foodcontact (North America).

Crown "Natural" grades are additionally certified for direct contact with dry, moist and fatty foodstuffs and are compliant with the FDA 21 CFR 176.170 (North America).

Only use of additives allowed under BfR Empfehlung XXXVI and/or FDA.

EU Regulation 752/2017 plastic materials and articles intended to come into contact with foodstuff, replaces EU 10/2011.

EU Regulation No 1935/2004, materials and articles intended to come into contact with foodstuffs; implemented in the French legislation Décret 2007-766 (10-05-2007) and Décret 2008-1469 (30-12-2008).

EU Regulation 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

RIS RSL Retail Information Services Restricted Substances List for Label

Furthermore are our products in compliance (do not contain substances or have contents below declarable levels) with:

- Nestle standards on materials in contact with food abstract (v 3.0; 2014).
- With the exception of #8: High temperature applications (ovenable).
- Ikea IOS-Mat-0010 (AA-10911-8)
- SONY SS 00259 Standard
- Retail Information Services Restricted Substances List for Label (RISL), last check list at December 2015
- Global Automotive Declarable Substance List (GADSL), last check list at December 2015
- Oeko-Tex (published 04-02-2011)

Neither contain the following substances (there may be overlap with already mentioned regulations or lists):

- 4-4'-methylenebis(2,6-diethylaniline (CAS 13680-35-8)
- 4-tert-butylphenol-formaldehyde resin (CAS 25085-50-1)
- Adipates
- Alkylphenols; Alkylphenoethoxylates; Alkylphenolderivatives; APE (Alkyl Penoxy Ethoxylates); ortho-phenylphenol
- Anthraquinone
- Bisphenol A (BPA); Biphenyl-2-ol; BPS (Bisphenol-S) (CAS 80-09-1)
- Bismuth and bismuth compounds
- Carcinogenic, Mutagen or Reproduction toxic substances (CMR).
- Contraceptives; Dimethyl fumarate; Dioxines and furanes
- Diethylhydroxylamin ; Dimethylterephthalate (CAS 120-61-6);
- Dibutyl Tin Dilaurate (CAS#: 77-58-7)
- Ethyleenoxide
- Flame retardants
- Formaldehyde
- Food Allergens as listed by the EU FIC
- Genetically Modified Organism (GMO) derivatives
- Gluten
- Glyoxal (CAS 107-22-2)
- ITX; 2-(1-methylethyl)-9H-Thioxanthen-9-one
- Irradiation Treatment
- Lactose
- Material from human or animal origin (including blood), material is Vegan Free
- Methylbenzophenone (CAS 134-84-9)
- Mineral oils, (MOSH, MOAH)
- Microbe derivatives: any material that is produced by microbial growth or fermentation, not intended to include normal contaminants that are incidental to controlled production.
- Morpholinylmercaptobenzothiazole, monosulfide, disulfide and sulfonamides.
- Mustard and derivates

- Mutagenic substances or Reproduction toxic substances
- (Restricted use according to REACH regulation 1907-2006 Annex XVII)
- Nuts / Seeds
- PAHs/ MAH's Polycyclic Monocyclic aromatic hydrocarbons,
- Pigment Yellow 3 (CAS 2783-94-0)
- PBT substances
- PFC (Perfluorcarbon), PFCA (Perfluorocarboxylic acids);
- PFOS and PFOA (Perfluorooctanesulfate / sulfonic acid)
- Phthalats such as di(2-ethylhexyl) phthalate (DEHP), diisodecyl phthalate (DIDP), diisononyl phthalate (DINP) Benzylbutylphthalate (BBP), DOP, DINP DIBP or other plasticizers.
- POP's (Persistent Organic Pollutants);
- PVC (polyvinylchloride)
- Quarternary Ammonium Compounds
- Polyisoprene, Isoprene based rubber components, Carba / Mercepto / Thiuram
- Trichloran
- vPvB substances
- Nickel

Fibre materials

All the pulp used in our products is from legal sources, complying at least with controlled wood criteria (FSC) or non controversial sources (PEFC) therefore fulfilling with the criteria of TPAC Timber Procurement Assessment Committee).

More than 60 % of our pulp sourcing has Chain of Custody certification. Chain of Custody certified products have to be ordered separately at our Sales organisation. Crown Van Gelder only uses ECF and TCF bleached fibers in the production.

Fulfilment of requirement EU Timber Regulation (EUTR) EU 995/2010

The EU Timber Regulation is enforced from March 2013. Crown Van Gelder is both a trader and an operator in the light of this Regulation, depending on the pulp suppliers' location. The "Inkoopcombinatie de Eendragt" acts on behalf of Crown Van Gelder as buyer for the market pulp that is used in the mill. "Inkoopcombinatie De Eendragt" handles all necessary administration and controls for the purchasing of pulps and for the validity of claims (sustainable wood certificates, legality of wood sources, composition without CITES listed species) and has the due diligence system in place to ensure this. If necessary, compliance with EUTR can be proven to the competent authorities that will be established to enforce the Regulation. Traders as such are not considered to be a competent authority, but are free to request for controls at the competent authorities in case of doubt.

Conflict Minerals: all products of Crown Van Gelder are free of minerals that are extracted from the Democratic Republic of Congo (DRC) and the surrounding regions. Minerals such as tin, tungsten tantalum and gold (commonly referred to as the 3TGs), are not used in the products or manufacturing processes at all.

Crown Van Gelder is one of the frontrunners with FSC and PEFC Chain of Custody certification. Both FSC and PEFC have completed their process to make their monitoring systems fully compliant to the EUTR^{1,2}.

¹ <http://www.pefc.org/news-a-media/general-sfm-news/1172-meet-eutr-requirements-through-pefc-chain-of-custody-certification>

² <http://www.fsc.nl/nl-nl/nieuws/id/896>

An anonymised list of all species which Crown Van Gelder buys on the market can be provided on request

AOX emissions

The average AOX emission in effluents of paper and pulp production of all our papers is below 0,10 kg/ adt paper. All of the individual pulps have an AOX emission at their site less than 0,21 kg/adt pulp.

This statement will be updated regularly, based on changed legislation and/or customer requests. Please ask our sales department for the most recent version. We expect that this statement fulfills your needs. If you have any further questions please do not hesitate to contact us.

Yours faithfully,
Crown Van Gelder B.V.

J.W. van der Werff,
Technology department