

MANUFACTURER

Name: Torraspapel S.A. - Lecta
Llull, 331 - 08019 Barcelona - Spain

Production site: Zaragoza - Avda. Montañana 429 50059 Zaragoza (Spain)

Sant Joan - C/ Paperera Torras, s/n 17857, Sant Joan Les Fonts (Girona) - Spain

PRODUCT

Name: GardaBook White

Description: High white uncoated woodfree paper

This declaration of compliance is valid for all the paper's grammages.

FOOD CONTACT COMPLIANCE

This information is based on the declarations of our suppliers as well as on the results of the tests performed by accredited external independent laboratories. Raw materials have been selected for compliance and are suitable according to the risk assessment of starting materials.

The product is suitable for direct contact with dry and fatty food, according to European legislation, and suitable for direct contact with all kind of food according to FDA, at temperatures up to 40°C for a long period of time. The product complies with the last update of the following norms:

- **European Parliament and Council Commission Regulation (EC) 1935/2004**, of 27 October 2004 on materials and articles intended to come into contact with foodstuffs for the intended food contact applications and conditions mentioned above , and repealing Directives 80/590/EEC and 89/109/EEC.
- **Commission Regulation (EC) No 2023/2006 of 22 December 2006:** The product is manufactured according to good manufacturing practice for materials and articles intended to come into contact with food.
- **German Lebensmittel- und Futtermittelgesetzbuch (LFGB)** on food contact paper and board for the intended food contact applications and conditions mentioned above . The conformity assessment has been carried out on the basis of " **Bundesinstitut für Risikobewertung (BfR) XXXVI Recommendation** and the results of the relevant migration tests.
- **Commission Regulation (EU) No 10/2011:** The product is a paper, as monomaterial, so this Regulation does not apply to it, as it is not plastic. However, the product complies with the analytical requirements based on this regulation about the content and/or migration of the substances with Specific Migration Limit (SML).
- **Decree No. 2007-766 and the relevant DGCCRF MCDA guidance documents (notably MCDA No. 4 for paper and board)** as regards materials and articles intended to come into

contact with foodstuffs for the intended food contact applications and conditions mentioned above.

- Analytical tests regarding **Italian national regulation Decreto Ministeriale** of 21 March 1973.
- Analytical tests regarding **Danish Order No. 681** of 25 May 2020, including confirmation of the absence of PFAS in paper and cardboard.
- **Code of Federal Regulations, Food and Drugs, FDA 21 CFR s 176.170** for Paper and Cardboard for contact with all types of food.
- **Sensory Analysis - Robinson Test:**
 - Norm DIN EN 1230-1 (odour, 24h - 23+/-3°C) of Sensory Analysis for paper in contact with foodstuffs.
 - Norm DIN EN 1230-2 (taste, 48h - 23+/-3°C, 75% HR) of Sensory Analysis for paper in contact with foodstuffs.

Within the European Union there is a mutual recognition principle. A product complying with food contact material regulation of one member state, can be brought to market in all member states.

Legislation not assessed:

- **Swiss Ordinance SR 817.023.21 of the FDHA** on materials and articles intended to come into contact with foodstuffs.
- **Canadian Food and Drugs Act** or any other Canadian legislation.
- **Japan Food Sanitation Act**, 1947; Article 18, Section III Apparatus and containers/packages, for indirect food contact end uses.
- **MHLW Guideline** for Safety Assurance in the manufacture of food utensils, container and packaging: GMP in Japan.
- **GB 9685-2016** or any other Chinese legislation.
- **ANVISA / Mercosur food contact legislation.**

DUAL ADDITIVES

No dual-use additives (additives that are also authorized as food additives or food flavorings) have been identified in the product that may migrate into food, or be out of compliance with any restrictions set out in Regulation 1333/2008/EU on food additives, as amended, or Regulation 1334/2008/EU on flavorings, as amended, but we confirm that some have been used in its manufacture:

E Number	Dual additive	CAS Number
E - 170	Calcium carbonate	1317-65-3
E - 330	Citric acid	77-92-9
E - 355	Adipic acid	124-04-9
E - 514	Sodium sulphate	7757-82-6
E - 524	Sodium hydroxide	1310-73-2
E - 551	Silicon dioxide	7631-86-9

OTHERS

- **Regulation Reach 1907/2006/EC** concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals:

This product does not contain any of the substances included in the latest update to the list of substances of very high concern (SVHC) over a limit of 0,1% (w/w), nor does it contain any substances listed in Annex XIV and XVII of the REACH Regulation.

Restrictions under Annex XVII are complied with in accordance with the specific conditions defined in the Regulation.

- **Commission Regulation (UE) 2024/3190** on the use of Bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food:

This product doesn't contain Bisphenol A (BPA) or Bisphenol S (BPS). The applicability of restrictions and any transitional measures depends on the intended use and must be assessed by the manufacturer placing the final food contact material or article on the market.

- **Regulation PPWR (UE) 2025/40, CONEG and TPCH:**

The product complies the analytical safety testing regarding total content of heavy metals, according to the Packaging and Packaging Waste Regulation, that replaces the European Parliament of the Council Directive 94/62/EC on packaging and packaging waste and its subsequent amendments like Directive 2018/852, Regulation (EU) 2019/1020 and the Directive 2019/904.

The product also complies with the Model Toxics in Packaging Legislation of CONEG (Coalition of Northeastern Governors) and TPCH (Toxics in Packaging Clearinghouse).

The sum of the concentrations of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr (VI)) in packaging or packaging components shall not exceed 100 ppm by weight.

The product has not been manufactured using intentionally added PFAS.

DISCLAIMER

This document is intended to share food contact information for the product mentioned above and in any case constitutes any warranty. This document and its contents are subject to modification as a result of regulatory changes or applicable amendments.

The printer and the final manufacturer is responsible for ensuring that packaging or labeling constructions in which the product is used as a component is acceptable for their intended application, and complies with any applicable legislation and/or test requirement for the finished article. It is the responsibility of the manufacturer of the final packaging or article to verify the suitability of the product for its use and foreseen conditions. Also to (i) ascertain compliance with the overall migration limit (OML) as well as specific migration/safety limits (where applicable), and (ii) confirm compliance with Article 3.1(c) of the Framework Regulation prohibiting the alteration of the organoleptic characteristics of the food.

Date of issue: 06/10/2026



PERE CANET
TECHNICAL SERVICES DIRECTOR

VYHLÁSENIE O ZHODE S PREDPISMI O STYKU S POTRAVINAMI

Výrobca:

Torraspapel S.A. – Lecta

Llull, 331-08019 Barcelona – Španielsko

Výrobné závody: Zaragoza (Španielsko), Sant Joan Les Fonts (Španielsko)

Produkt: GardaBook White

Popis: Nenatieraný bezdrevný papier s vysokou belosťou.

Platnosť: Vyhlásenie o zhode platí pre všetky plošné hmotnosti (gramáže) tohto papiera.

Súlady s predpismi pre styk s potravinami

Tieto informácie vychádzajú z vyhlásení našich dodávateľov a z výsledkov testov vykonaných akreditovanými externými nezávislými laboratóriami. Suroviny boli zvolené s ohľadom na súlad s predpismi a sú vhodné na základe posúdenia rizík vstupných materiálov.

Produkt je vhodný na **priamy kontakt so suchými a masnými potravinami** (podľa európskej legislatívy) a na **priamy kontakt so všetkými druhmi potravín** (podľa americkej FDA) pri teplotách do 40 °C počas dlhodobého styku.

Kľúčové normy a nariadenia, ktoré produkt spĺňa:

- **Nariadenie Európskeho parlamentu a Rady (ES) č. 1935/2004:** O materiáloch a predmetoch určených na styk s potravinami.
- **Nariadenie Komisie (ES) č. 2023/2006 (SVP/GMP):** Výrobok je vyrábaný v súlade so správnou výrobnou praxou.
- **Nemecký zákon LFGB a odporúčanie BfR XXXVI:** Pre papier a lepenku určené na styk s potravinami.
- **Nariadenie Komisie (EÚ) č. 10/2011:** Keďže ide o monomateriálový papier, toto nariadenie pre plasty sa naň priamo nevzťahuje. Papier však vyhovuje analytickým požiadavkám na obsah a/alebo migráciu látok so špecifickým limitom migrácie (SML).
- **Francúzsky výnos č. 2007-766 a usmernenia DGCCRF MCDA:** Najmä MCDA č. 4 pre papier a lepenku.
- **Taliansky výnos Decreto Ministeriale z 21. marca 1973:** Vyhovuje analytickým testom národnej legislatívy.
- **Dánska vyhláška č. 681 z 25. mája 2020:** Súlad potvrdzuje absenciu PFAS v papieri a lepenke.
- **Americká FDA 21 CFR § 176.170:** Pre papier a lepenku určenú na kontakt so všetkými druhmi potravín.
- **Senzorická analýza (Robinsonov test):** Vyhovuje normám DIN EN 1230-1 (pach) a DIN EN 1230-2 (chuť).

Princíp vzájomného rozpoznávania v EÚ: Výrobok, ktorý spĺňa predpisy o materiáloch prichádzajúcich do styku s potravinami v jednom členskom štáte EÚ, môže byť uvedený na trh vo všetkých členských štátoch.

Dvojité prídavné látky (Dual Additives)

V produkte neboli identifikované žiadne látky s dvojitým použitím (prísady schválené aj ako potravinárske prísady alebo arómy), ktoré by migrovali do potravín v rozpore s obmedzeniami podľa nariadení (ES) č. 1333/2008 a 1334/2008. Pri výrobe sa však používajú nasledujúce schválené látky:

- **E-170** (Uhličitan vápenatý / Calcium carbonate)
- **E-330** (Kyselina citrónová / Citric acid)
- **E-355** (Kyselina adipová / Adipic acid)
- **E-514** (Síran sodný / Sodium sulphate)
- **E-524** (Hydroxid sodný / Sodium hydroxide)
- **E-551** (Oxid kremičitý / Silicon dioxide)

Ostatné predpisy a bezpečnosť

- **REACH (ES 1907/2006):** Neobsahuje žiadne látky zo zoznamu SVHC (látky vzbudzujúce veľmi veľké obavy) nad limit 0,1 % w/w, ani látky z príloh XIV a XVII.
- **Bisfenoly (EÚ 2024/3190):** Neobsahuje Bisfenol A (BPA) ani Bisfenol S (BPS). Použitelnosť obmedzení a prechodných opatrení závisí od zamýšľaného použitia a musí ju posúdiť výrobca, ktorý uvádza finálny obal na trh.
- **Obaly a odpady z obalov (PPWR EÚ 2025/40, CONEG a TPCH):** Súčet koncentrácií ťažkých kovov (olovo Pb, kadmium Cd, ortuť Hg a šesťmocný chróm Cr(VI)) neprekračuje 100 ppm hmotnostných.
- **PFAS:** Výrobok nebol vyrobený s použitím zámerne pridaných látok PFAS.

Upozornenie a zodpovednosť

Tento dokument slúži na poskytnutie informácií o styku s potravinami pre vyššie uvedený produkt a nepredstavuje záruku. Podlieha zmenám v dôsledku legislatívnych úprav.

- **Zodpovednosť tlačiarne a konečného výrobcu:** Tlačiareň a výrobca finálneho obalu sú zodpovední za to, aby obalové alebo etiketovacie konštrukcie boli prijateľné pre ich zamýšľané použitie a spĺňali platnú legislatívu.
- Je povinnosťou výrobcu finálneho obalu overiť vhodnosť produktu, dodržanie celkového limitu migrácie (OML), špecifických limitov migrácie a zabezpečiť, aby nedošlo k negatívnemu ovplyvneniu organoleptických vlastností potraviny.

Dátum vydania: **10. 06. 2026**