

MANUFACTURER

Name: Lecta (Cartiere del Garda SpA, Torraspapel SA)
Llull, 331 - 08019 Barcelona - Spain

Production site: Garda - Viale Rovereto 15 38066 Riva del Garda (TN) - Italy

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

Motril - Camino de la Vía s/nº E 18600 Motril (Granada) - Spain

PRODUCT

Name: Garda Matt Art

Description: Garda 2 side coated woodfree paper with a smooth silk surface and high print brilliance.

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

FOOD CONTACT COMPLIANCE

Raw materials have been selected for the compliance with the requirements for these end uses and is suitable according to the risk assessment of starting materials and process used for its manufacture, and based in the results of analytical tests performed by an accredited external laboratory, to certify that the the product complies the last update of the following recommendation and legislations.

The product is suitable for applications involving contact on both side of paper, at temperatures up to 40°C for a long period of time of contact with:

- Dry and fatty foodstuffs (according to BfR XXXVI and French Decrees).
- Dry foodstuffs (according to Italian Decree 21.03.1973).
- Dry, moist and fatty foodstuffs (according to FDA 21 CFR § 176.170 and 176.180).

The product complies the last update of the following norms:

- **Commission Regulation (EC) 1935/2004** of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food. The compliance assessment is based in the **Food Contact guidelines for the compliance of paper & board materials and articles (CEPI)**.
- **Commission Regulation (EC) No 2023/2006** of 22 December 2006: **is manufactured according to Good Manufacturing Practices (GMP) for materials and articles intended to come into contact with food. The compliance assessment is based in the GMP guideline for the manufacture of paper and board for food contact (CEPI)**.
- **Bundesinstitut für Risikobewertung (BfR) XXXVI Recommendation and German LFGB (Foodstuffs and Animal Feed Code)** for single and multi-layered commodities (articles,

materials) made of paper or paperboard, as well as fiber casting, which are intended to come into contact with or affect dry and fatty foodstuffs.

- **French Regulation “French DGCCRF”** (French Decrees No. 92-631, 2007-766 (as amended up to Decree No. 2008-1469) and Information Note DGCCRF No. 2004-64 and MCDA No. 4, as regards materials and articles intended to come into contact with food (dry and fatty foodstuffs).
- **Decreto Ministeriale of 21 March 1973** : “Disciplina igienica degli imballaggi, recipienti, utensili destinati a venire a contatto con le sostanze alimentari o con sostanze d’uso personale”. Analytical part of Italian national regulation for dry food.
- **Regulation (EU) 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). According to the results obtained, the product is suitable for the conditions and types of food mentioned above. The product complies also with the Sensory Analysis mentioned in this norm.
- **Food Contact Legislation FDA 21 CFR § 176.170 and 176.180** for paper and paperboard for the contact with all kind of food (moist, fatty and dry food).
- **Danish Order No. 681 of 25 May 2020** on materials in contact with food and penalties for the violation of related EU legislation, related to PFAS : this paper is not intentionally manufactured with PFAS, and it is not expected to contain them, and PFAS, TOF and F have not been detected in the analysis of the paper.
- **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.

Other legislations not evaluated:

- **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** (Division 23 of the Food and Drugs Act and Regulations, Section B.23.001 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 - 1521	Polyethylene glycol	25322-68-3
E - 170	Calcium carbonate	1317-65-3
E - 170	Calcium carbonate	1317-65-3
E - 251	Sodium nitrate	7631-99-4
E - 262	Sodium diacetate	127-09-3
E - 300	Ascorbic acid	50-81-7
E - 321	Butilhidroxitolueno (BHT)	128-37-0
E - 330	Citric acid	77-92-9
E - 355	Adipic acid	124-04-9
E - 491	Sorbitan monostearate	1338-41-6
E - 514	Sodium sulphate	7757-82-6
E - 524	Sodium hydroxide	1310-73-2
E - 551	Silicon dioxide	7631-86-9
E - 553b	Talc	14807-96-6
E - 1203	Polyvinyl alcohol (PVA)	9002-89-5

OTHERS

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

This product does not contain any of the substances listed in the latest update of the SVHC (Substances of Very High Concern) list and does not contain any of the substances included in annex XIV and annex XVII of this Regulation, over a limit of 0.1% (w/w).

- **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).

- **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 is not manufactured using PFAS and doesn't contain PFAS or Ortho-phthalates.

DISCLAIMER

This document and its contents are subject to modification as a result of regulatory changes or applicable amendments. We undertake to update this document in the case of any modification on the product or on the legislation that affects the information described here.

Information about composition is confidential and belongs to our know-how. For additional information on substances contained in the composition or substances with migration limits, Lecta will contact directly the laboratory that is going to carry out the certification tests for our customers, after signing an NDA.

This product is physiologically and toxicologically safe if used according to the intended purpose and may hence be used safely in packaging to be printed with usual printing systems, keeping with Article 3 of the Framework Regulation (EC) No. 1935/2004 provided the migration/safety limits are complied with and the safety of the low molecular weight monomers and oligomers present in the final food-contact article is further assessed.

The printer and the final user 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 user or 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.

The content of this document is strictly confidential and may not be shared or sent to third parties without the prior authorization of Lecta.

Date of issue: 03/05/2026



PERE CANET
TECHNICAL SERVICES DIRECTOR

VOHLÁSENIE O ZHODE S PREDPISMI O STYKU S POTRAVINAMI

Výrobca: Lecta (Cartiere del Garda SpA, Torraspapel SA) Llull, 331-08019

Barcelona – Španielsko

Výrobné závody: Garda (Taliansko), Sant Joan (Španielsko), Motril (Španielsko)

Produkt: Garda Matt Art

Popis: Obojstranne natieraný bezdrevný papier Garda s hladkým saténovým povrchom a vysokou žiarivosťou tlače. **Platnosť:** Vyhlásenie platí pre všetky plošné hmotnosti (gramáže) tohto papiera.

Súlada s predpismi pre styk s potravinami

Suroviny boli zvolené tak, aby spĺňali požiadavky na koncový účel použitia. Na základe posúdenia rizík a výsledkov analytických testov z akreditovaného externého laboratória produkt vyhovuje najnovším aktualizáciám legislatívy.

Produkt je vhodný pre aplikácie vyžadujúce **obojsstranný kontakt s potravinami pri teplotách do 40 °C pri dlhodobom styku** pre:

- **Suché a masné potraviny** (podľa BfR XXXVI a francúzskych výnosov).
- **Suché potraviny** (podľa talianskeho výnosu z 21. 3. 1973).
- **Suché, vlhké a masné potraviny** (podľa FDA 21 CFR § 176.170 a 176.180).

Kľúčové normy a nariadenia, ktoré produkt spĺňa:

- **Nariadenie EP a Rady (ES) č. 1935/2004:** O materiáloch a predmetoch určených na styk s potravinami (posúdené podľa smerníc CEPI).
- **Nariadenie Komisie (ES) č. 2023/2006 (SVP/GMP):** Výrobok je vyrábaný v súlade s správnou výrobnou praxou.
- **Nemecké odporúčanie BfR XXXVI a zákon LFGB:** Pre jednovrstvové a viacvrstvové výrobky z papiera a lepenky určené na styk so suchými a masnými potravinami.
- **Francúzske predpisy (DGCCRF):** Pre styk so suchými a masnými potravinami.
- **Nariadenie (EÚ) č. 10/2011:** Keďže ide o monomateriálový papier, toto nariadenie o plastoch sa naň priamo nevzťahuje. Papier však vyhovuje analytickým požiadavkám na obsah a/alebo migráciu látok so špecifickým limitom migrácie (SML) aj požiadavkám na senzorickú analýzu.
- **Americká FDA 21 CFR § 176.170 a 176.180:** Pre styk so všetkými druhmi potravín.
- **Dánska vyhláška č. 681/2020 (PFAS):** Papier nie je zámerne vyrábaný s použitím PFAS; v laboratórnych analýzach neboli zistené žiadne látky PFAS, TOF ani F.
- **Senzorická analýza (Robinsonov test):** Vyhovuje normám DIN EN 1230-1 (pach) a DIN EN 1230-2 (chuť).

Princíp vzájomného rozpoznávania v EÚ: Produkt, 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, ktoré by migrovali do potravín v rozpore s nariadeniami (ES) č. 1333/2008 a 1334/2008. Pri výrobe sa však používajú nasledujúce schválené látky:

- **E-170** (Uhličitan vápenatý)
- **E-300** (Kyselina askorbová)
- **E-330** (Kyselina citrónová)
- **E-514** (Síran sodný)
- **E-524** (Hydroxid sodný)
- **E-551** (Oxid kremičitý)
- **E-553b** (Mastenec)
- **E-1203** (Polyvinylalkohol - PVA) a ďalšie pomocné látky uvedené v dokumentácii.

Ostatné predpisy a bezpečnosť

- **REACH (ES 1907/2006):** Neobsahuje žiadne látky zo zoznamu SVHC (látky vzbudzujúce veľmi veľké obavy) ani látky z príloh XIV a XVII nad limit 0,1 % w/w.
- **Bisfenoly (EÚ 2024/3190):** Neobsahuje Bisfenol A (BPA) ani Bisfenol S (BPS).
- **Obaly a odpady z obalov (PPWR EÚ 2025/40, CONEG, TPCH):** Súčet koncentrácií ťažkých kovov (Pb, Cd, Hg, Cr(VI)) neprekračuje 100 ppm. Produkt neobsahuje ortho-ftaláty ani PFAS.

Upozornenie pre spracovateľov a tlačiarne

Z fyziologického a toxikologického hľadiska je výrobok bezpečný, ak sa používa na určený účel.

- **Zodpovednosť tlačiarne a koncového používateľa:** Tlačiareň a výrobca finálneho obalu sú zodpovední za to, aby hotový obal alebo etiketa vyhovovali platnej legislatíve pre danú aplikáciu.
- Je povinnosťou spracovateľa overiť celkový limit migrácie (OML), špecifické limity migrácie a zabezpečiť, aby nedošlo k negatívnemu ovplyvneniu organoleptických (zmyslových) vlastností potraviny.

Dátum vydania: **05. 03. 2026**