

## Sappi Europe

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June 24, 2026

## Declaration of Compliance

Product Name: Magno Satin

Product Description: Coated fine paper

### 1. General Information

#### Pulp composition

The above mentioned product is produced with a mixture of elementary (ECF) and totally chlorine free (TCF) bleached chemical pulp cellulose fibres. The production is based on virgin fibres only and no recycled fibres are used for pulp preparation. We further confirm that the above mentioned product is produced without intentional addition of any recycled materials.

#### Acid content/Chloride content

The pH of *Magno Satin* is above 7. *Magno Satin* can be described as neutral or slightly alkaline. It has not been tested for chloride content.

#### Producing mill

*Magno Satin* is produced at Ehingen mill, Gratkorn mill or Maastricht mill.

### 2. Food Contact Status

#### Conditions for food contact

*Magno Satin* has been assessed by an accredited laboratory for food contact suitability. According to the food contact certificate issued by the laboratory, it can be used for long term contact (maximum 2 years) at room temperature. It also can be used for short term contact (maximum 2 hours) at temperatures up to 90 °C (holding and reheating of food) in accordance with XXXVI recommendation of the BfR. It can be used in direct contact with dry foodstuff. Furthermore, contact can be made with such fatty foodstuffs which were assigned to a correction factor of at least 3 according to Annex III, table 2 of Commission Regulation EU 10/2011.

#### Compliance with (EU) No 1935/2004

*Magno Satin* has been assessed by an accredited laboratory and found to be in compliance with the requirements of Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. *Magno Satin* can be applied as packaging for foodstuffs, as indicated on the food contact certificate issued by the accredited laboratory.

#### Compliance with (EC) No 2023/2006

*Magno Satin* was manufactured in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food. Full traceability of raw materials is possible through the IT systems. The producing mill has implemented a quality management system according to ISO 9001. The quality management system is externally certified.

#### Compliance with BfR recommendation XXXVI

*Magno Satin* has been found to be in compliance with the requirements set in **Bundesinstitut für Risikobewertung (BfR) Recommendation XXXVI. „Papier, Kartons und Pappen für den Lebensmittelkontakt“ (Paper and board for food contact).**

## Compliance with Foodstuffs and Animal Feed Code (LFGB)

*Magno Satin* is in compliance with the rules of the current version of the Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code (LFGB)).

## Compliance with FDA requirements for food packaging

*Magno Satin* has not been assessed according to the demands of the Code of Federal Regulations, Foods and Drugs (FDA), 21 CFR Ch. 1 (version of April 2024), §§ 176.170 and 176.180.

## Compliance with the Swiss Ordinance on food packaging materials

*Magno Satin* fulfills the requirements stated in the Swiss Ordinance on Materials and Articles (SR 817.023.21), Part 9, Article 27. It solely contains virgin fibres and no recycled fibres.

## Compliance with (EU) No 10/2011

*Magno Satin* is not within the scope of *Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food* as it is not plastic.

## French regulation Fiche MCDA n°4 (V02 – 01/01/2019)

The above mentioned product has not been assessed for compliance in regard to the French regulation Fiche MCDA n°4 (V02 – 01/01/2019), or any French legislation.

# 3. Toy Safety

## EU toy safety directive

*Magno Satin* meets the requirements of Directive 2009/48/EC of the European Parliament and of the Council on the safety of toys, including the latest amendments, for scraped-off toy materials regarding their chemical properties. It can be safely used in toys for children older than 3 years and for toys that are not intended to be placed in the mouth.

## Toy safety EN 71/3

*Magno Satin* has been tested and found to be in compliance with the demands of the latest version of the Toy Safety standard EN 71-3: "Migration of certain elements".

## Toy safety EN 71/9

*Magno Satin* has been tested and found to be in compliance with the demands of the Toy Safety standard EN 71 part 9:2005: "Organic chemical compounds". The formaldehyde concentration in accordance with EN 645 and EN 1541 was confirmed to be below the limit of 30 mg/kg.

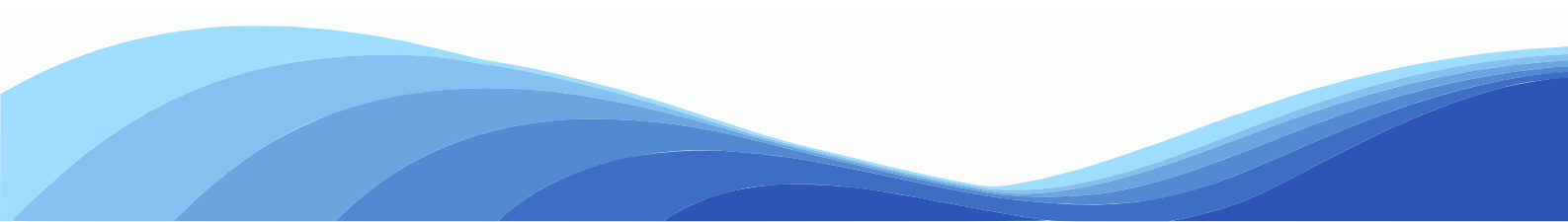
# 4. Relevant legislation

## Compliance with EC 1907/2006 (REACH)

The regulation EC No 1907/2006 (REACH) primarily addresses chemical substances, mixtures and articles being placed on the market in the European Union (EU) / European Economic Area (EEA). Registration requirements under the REACH regulation apply to substances and as such they do not apply to the above mentioned product being placed on the EU / EEA market by Sappi. Any REACH registration obligations that apply to the raw materials (substances) being used in the manufacturing processes of our products are being met by our suppliers and we request confirmations from our suppliers that they have fulfilled those obligations.

To the best of our knowledge, no substance listed on either the Candidate List for Substances of Very High Concern (SVHC) nor any of those substances already listed in Annex XIV for Authorisation under REACH, are found in the products we are supplying to our customers at concentrations >0.1%. Amendments of the SVHC list up to and including 4th of February 2026 have been considered.

Any information that needs to be passed down the supply chain in accordance with the provision of information requirements of the REACH regulation will be communicated to you separately where required and in the appropriate format, as regulated by Article 33 of EC 1907/2006.



## Compliance with Regulation (EU) 2025/40 (PPWR)

Article 5(4) – Regulation (EU) 2025/40 (PPWR), minimization of substances of concern (heavy metals):

*Magno Satin* complies with the heavy metal requirements set out in Article 5.4 of Regulation (EU) 2025/40 (PPWR).

Article 5(5) – Regulation (EU) 2025/40 (PPWR), substances of concern (PFAS / Total Fluorine):

PFAS are not intentionally added in the manufacturing process of *Magno Satin*. Sappi paper grades were analyzed according to the testing approach recommended in the guidance for Article 5(5) of Regulation (EU) 2025/40 (PPWR). Based on the obtained test results, *Magno Satin* complies with the requirements set out in Article 5(5) of Regulation (EU) 2025/40 (PPWR).

Article 6 – Regulation (EU) 2025/40 (PPWR), recyclability:

The recyclability of *Magno Satin* has been proven. The requirements set in EN 13430:2004 (Requirements for packaging recoverable by material recycling) are met.

*The data reflects compliance with Regulation (EU) 2025/40 (PPWR), including Article 5(4) (heavy metals), Article 5(5) (substances of concern / PFAS), and Article 6 (recyclability), as applicable. Representative samples from each mill and/or each brand family have been selected, tested and cross-referenced. This information is valid for paper products delivered by Sappi mills, prior to any further converting processes.*

## CONEG

*Magno Satin* is in compliance with the demands of the current version of the Model Toxics Legislation by the Source Reduction Council of CONEG regarding the content of heavy metals. The sum of the heavy metals Cr(VI), Pb, Cd, Hg is below 100 ppm.

## EN 13427

In case *Magno Satin* is used as part of a packaging material, the following statements regarding the EN 13427 et seqq. may serve as the input for the producer of the finished packaging.

- EN 13427: This standard specifies requirements and a procedure by which a person or organization responsible for placing packaging or packed product on the market may combine the application of the following packaging standards.
- EN 13428: *Magno Satin* is made without the use of waste paper. The usage of hazardous chemicals during production has been minimized. The sum of content of the heavy metals lead (Pb), cadmium (Cd), mercury (Hg) and chromium (VI) (Cr(VI)) in *Magno Satin* is below 100 ppm.
- EN 13429: This is not directly applicable to *Magno Satin* and depends on the properties of the finished packaging.
- EN 13430: *Magno Satin* is fully recyclable and comply with the criteria of this standard regarding material recycling. We advise and encourage all users of our papers to recycle our papers after use.
- EN 13431: *Magno Satin* will contribute a positive calorific value for a thermal energy recovery process. We however recommend favoring material recycling over incineration.
- EN 13432: *Magno Satin* has not been tested on the requirements of this clause. We recommend favoring material recycling over composting.

## Compliance with Directive 2011/65/EU (RoHS)

The substances restricted by EU-directive 2011/65/EC Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (ROHS directive) and its amendments Directive (EU) 2015/863 and Directive (EU) 2017/2102 have not intentionally been added to the manufacturing process of the above mentioned product. They are not expected to be present above the maximum allowed thresholds levels.

## Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

Substances listed in the latest version of the Safe Drinking And Toxic Enforcement Act of 1986 Proposition 65 have not intentionally been added to the manufacturing process of the above mentioned product. Updates until and including December 5th, 2025 have been considered.

## Canadian Environmental Protection Act

Substances listed in Canadian Environmental Protection Act, 1999 are not intentionally added to the manufacturing process of *Magno Satin*.

## 5. Miscellaneous

### BSE/TSE risk

Raw materials of animal origin classified as risk materials according to COMMISSION REGULATION (EC) No 1326/2001, Annex III, are not used during the manufacture of *Magno Satin*. For all processing aids, i.e. defoamers, we already have declarations of our suppliers available that specifically exclude a TSE risk. In detail, the respective suppliers confirmed, that during the production of respective raw materials and their precursors, the conditions outlined in EMEA/410/1, section 6.4., respectively in Annex I 3. of EU 722/2012 are applied.

### Substances of animal origin

The presence of traces of substances of animal origin in *Magno Satin* cannot be fully excluded.

## 6. Information on end-of-life scenarios

### Recyclability

The above mentioned product is fully recyclable in the waste paper stream. *Magno Satin* has not been tested for its repulpability properties, but to the best of our knowledge about *Magno Satin* composition, manufacturing process, and raw materials we are not aware of any limitations to its recyclability. To the best of our knowledge, the recycling code PAP 22 according to Annex II of 97/129/EC can be assigned to a hypothetical packaging consisting purely of above mentioned material.

### Biodegradability

The above mentioned product has not been tested on biodegradability or compostability. Under the conditions of a compost heap or a well managed landfill site (sufficient air, moisture and heat) our coated paper would decompose into carbon dioxide and minerals, but without testing we can not estimate how long it takes. Our coated papers do contain fossil polymer binders in quantities above 1%. We advise to favor paper recycling over composting in order to maximize the value and the lifecycle of the virgin fibres. If recycling is not possible, for example due to contamination or moisture, then composting or energy recovery are acceptable options.

## 7. Non-use and use of specific substances or materials

### Genetically modified organisms

Genetically modified organisms are not intentionally added to the manufacturing process of *Magno Satin*.

### MOSH/MOAH (mineral oil)

Mineral oil is not used as a paper raw material in the production of this grade. However, traces of substances originating from defoamers, stabilizers or other materials used during production may lead to a positive result in a MOSH-analysis.

### Anthraquinone

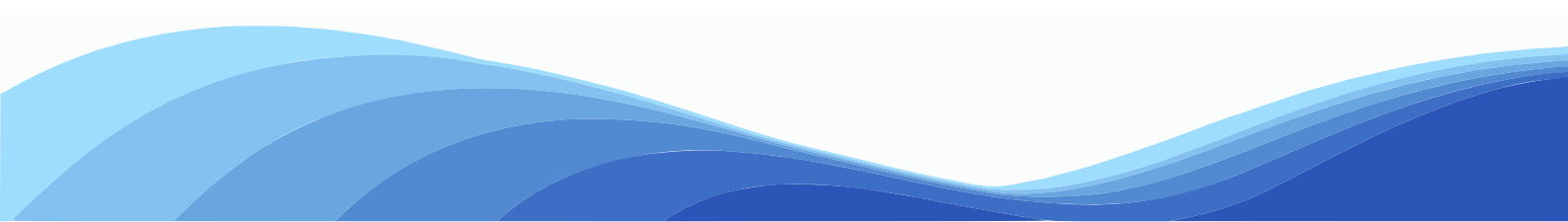
Anthraquinone (CAS 84-65-1) has not been added to the manufacturing process of the above mentioned product. Its nonpresence in the raw materials is screened regularly.

### Nanomaterials

Raw materials, such as calcium carbonate, containing particles with one or more external dimensions in the nano range may be used in the manufacturing process of the above mentioned product. These particles would meet the definition of nanoparticles according to Commission Recommendation of 10 June 2022. The presence of these particles in the respective raw materials arises from a naturally occurring and/or technically unavoidable particle number-based size distribution. These particles are embedded in the paper matrix and are not anticipated to undergo migration.

### Allergenes

No substances with allergenic hazard according to Annex II of EU 1169/2011 are intentionally added during the production of *Magno Satin*, except for wheat starch, which in turn may contain gluten. Amendments of EU 1169/2011, namely Commission Delegated Regulation (EU) No 78/2014 and Commission Delegated Regulation (EU) No 1155/2013 have been considered.



## Glycides

*Magno Satin* has not been tested for the presence of glycidyl fatty acid esters as well as glycidyl silanes, such as GLYMO or GLyEO. We do not intentionally add these chemicals to the manufacturing process and they are not expected to be present in the final product.

## Persistent organic pollutants

None of the following substances listed in the annexes of the Stockholm Convention (last updated 2025) have been intentionally added during production of this product:

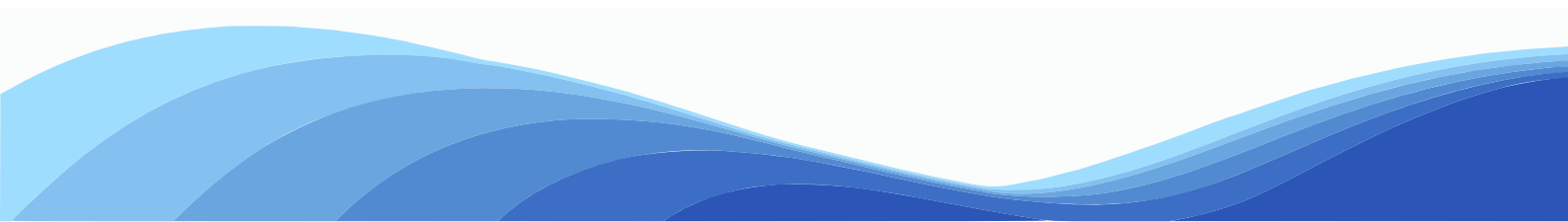
### Annex A (Elimination)

- Aldrin
- Chlordane
- Chlordecone
- Chlorpyrifos
- Decabromodiphenyl ether (commercial mixture, c-decaBDE)
- Dechlorane Plus
- Dicofol
- Dieldrin
- Endrin
- Heptachlor
- Hexabromobiphenyl
- Hexabromocyclododecane (HBCDD)
- Hexabromodiphenyl ether and heptabromodiphenyl ether
- Hexachlorobenzene (HCB)
- Hexachlorobutadiene (HCBd)
- Alpha hexachlorocyclohexane
- Beta hexachlorocyclohexane
- Lindane
- Long-chain perfluorocarboxylic acids, their salts and related compounds
- Medium-chain chlorinated paraffins (MCCPs)
- Methoxychlor
- Mirex
- Pentachlorobenzene
- Pentachlorophenol and its salts and esters
- Polychlorinated biphenyls (PCBs)
- Polychlorinated naphthalenes
- Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds
- Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds
- Short-chain chlorinated paraffins (SCCPs)
- Technical endosulfan and its related isomers
- Tetrabromodiphenyl ether and pentabromodiphenyl ether
- Toxaphene
- UV-328

### Annex B (Restriction)

- DDT
- Perfluorooctanoic acid (PFOS), its salts and perfluorooctanoic sulfonyl fluoride (PFOSF)

### Annex C (Unintentional production)

- Hexachlorobenzene (HCB)
  - Hexachlorobutadiene
  - Pentachlorobenzene
  - Polychlorinated biphenyls (PCBs)
  - Polychlorinated dibenzo-*p*-dioxins (PCDD)
  - Polychlorinated dibenzofurans (PCDF)
  - Polychlorinated naphthalenes
- 

None of the substances listed in Annexes I - IV in Regulation EU 2019/1021 are intentionally added during the production of *Magno Satin*. The amendments up to and including 22th July 2024 (EU) 2024/2570 have been considered.

## Titanium oxides

Titanium oxides (CAS 13463-67-7, 1317-80-2, 1317-70-0) are not intentionally added. The substances are not part of *Magno Satin* formulation and they are not expected to be present in *Magno Satin*.

## Optical brightening agents

Optical brightening agents (OBAs) are intentionally used during the manufacture of *Magno Satin*. These substances are used in accordance with respective BfR recommendations and FDA legislation.

## PVDC

Polyvinylidene chloride (PVDC) is not added to the manufacturing process of the above mentioned product.

## Sulfur

As far as it concerns content of sulfur species, the above mentioned product is expected to contain almost exceptionally sulphate species, which originate from the fiber base. Sulphates are not considered 'reducible sulfur species' according to Tappi T406 and therefore not expected to oxidize metals in direct contact. The amount of 'Reducible sulfur species' according to Tappi T406 is expected to be at trace levels and therefore below the threshold to cause oxidation.

## Conflict minerals

No gold, tin, tantalum or tungsten, or their derivatives, such as coltran, cassiterite, columbite-tantalite or wolframite, as laid out in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, are added during the production of *Magno Satin*.

## CMR Substances according to CLP legislation

During the production of *Magno Satin*, no substances classified as cancerogenic, mutagenic or toxic for reproduction according to CLP regulation EC 1272/2008 are intentionally added.

## Wet strength agents

Wet strength agents have not been added to the manufacturing process of the above mentioned product.

## SIN List

None of the substances on the SIN list developed by the non-profit organisation ChemSec are intentionally added during manufacture or known to be present in the raw materials of *Magno Satin*, with the exception of the biocide Glutaral (CAS No 111-30-8). However, this substance has not been detected in the final product, nor do our papers have any biocidal properties. This is most likely due to degradation in the process conditions of the drying section where the paper product is exposed to high temperatures.

Amendments up to and including January 2023 have been taken into account.

## Flame retardants

No flame retardants have been added to the manufacturing process of *Magno Satin*. We can confirm non-use of the following substances commonly used as flame retardants:

- Antimony trioxide CAS (1309-64-4)
- TBPH, Bis(2-Ethylhexyl)-3,4,5,6- tetrabromophthalate CAS (26040-51-7)
- TBB, 2-Ethylhexyl-2,3,4,5-tetrabromobenzoate CAS (183658-27-7)
- Chlorinated paraffins CAS (108171-26-2)
- TCPP, Tris(1-chloro-2-propyl) phosphate CAS (13674-84-5)
- HBCD, Hexabromocyclododecane CAS (3194-55-6)
- TBBPA, Tetrabromobisphenol A CAS (79-94-7)

- TCEP, Tris(2-chloroethyl) phosphate CAS (115-96-8)
- TDCPP, Tris(1,3-dichloro-2-propyl) phosphate CAS (13674-87-8)
- Deca-BDE, Decabromodiphenyl ether CAS (1163-19-5)
- Octa-BDE, Octabromodiphenyl ether CAS (32536-52-0)
- Penta-BDE, Pentabromodiphenyl ether CAS (32534-81-9)

## TSCA Section 6

No substances listed under Section 6 of the US Toxic Substances Control Act have been intentionally added to the manufacturing process of *Magno Satin* and they are not expected to be present. At the time of the assessment the following persistent, bioaccumulative, and toxic chemical substances have been listed:

- PIP (3:1) - phenol, isopropylated phosphate (3:1) (CAS 68937-41-7)
- DecaBDE - decabromodiphenyl ether (CAS 1163-19-5)
- HCBd - hexachlorobutadiene (CAS 87-68-3)
- PCTP - pentachlorothiophenol (CAS 133-49-3)
- TTBP - 2,4,6-tris(tert-butyl)phenol (CAS 732-26-3)

## Ethylene oxide-based substances

Neither ethylene oxide (CAS 75-21-8) nor poly(antimony ethylene glycoxide) (CAS 29736-75-2), nor polyethylene glycol (CAS 25322-68-3) has been intentionally added during production of *Magno Satin*. Defoamers containing ethoxylated alcohols may be added.

## Endocrine disruptors

None of the substances listed in the lists I and III of the website <https://edlists.org/>, administered by The Danish Environmental Protection Agency, are intentionally added during production of *Magno Satin*, except for 2,2-dibromo-2-cyanoacetamide (DBNPA), CAS-No 10222-01-2, which is added as a biocide. It is not detected in the final paper.

## Other substances

None of the following substances/substance classes have been intentionally added to the manufacturing process of *Magno Satin*:

- Acetone (CAS 67-64-1)
- Alkylphenols and their ethoxylates
- Anthraquinone (CAS 84-65-1)
- Antimony Tris(Ethylene Glycoxide) (CAS 29736-75-2)
- Asbestos
- Azodicarbonamide (CAS 123-77-3)
- BAC (CAS 63449-41-2 )
- BADGE, BFDGE, NOGE
- Benzene (CAS 71-43-2 )
- Benzophenones
- Benzyl alcohol (CAS 100-51-6)
- Bisphenols
- Cadmium, lead, mercury, chromium and compounds thereof
- Chlorine and other halogens (Fluorine, Bromine, Iodine)
- Cholecalciferol (CAS 67-97-0)
- Cobalt and its compounds
- Creosote
- Cyanuric acid (CAS 108-80-5 )
- DDAC (CAS 7173-51-5 )
- Diisopropylnapthalenes (DIPNs)
- Dimethylfumarate (CAS 624-49-7)
- Dioxane (CAS 123-91-1)
- Disodium guanylate (CAS 5550-12-9)
- Epoxy resins

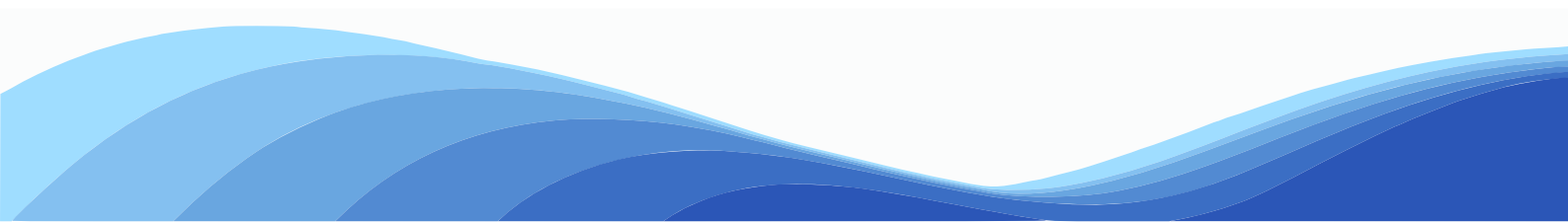
- Epoxidised Soybean Oil (ESBO)
- Ethanol (CAS 64-17-5)
- Ethylene oxide (75-21-8)
- Formaldehyde
- Glyphosate (CAS 107-83-6)
- Glycol ethers
- GLYMO (CAS 2530-83-8), GLYEO (CAS 2602-34-8) and their reaction products, as well as other epoxy silanes
- Hexane (CAS 110-54-3)
- Inosinate (CAS 4691-65-0)
- Isobornyl Acrylate (CAS 5888-33-5)
- Isopropyl alcohol (IPA) (CAS 67-63-0)
- Isopropylthioxanthone (ITX, CAS 5495-84-1, 83846-86-0)
- Mancozeb (CAS 8018-01-7)
- Melamine (CAS 108-78-1)
- Micas
- Monosodium glutamate (CAS 142-47-2)
- Natural rubber latex materials
- N-Ethyl-Toluenesulfonamide (CAS 8047-99-2)
- Nitrosamines, Nitrites, Nitrates
- Nitrocellulose
- N-Methylpyrrolidone (NMP) (CAS 872-50-4)
- 4-Nonylphenol (4-NP) (CAS 3050-88-2)
- Nonylphenoethoxylate (NPE, CAS 127087-87-0)
- Organic Peroxides
- Organotin compounds
- Orthophenylphenol (CAS 90-43-7)
- Partially hydrogenated terphenyls (HTPs)
- Pentachlorophenol (PCP)
- Pentanedione-2,4-titanium
- Perchlorates
- Pesticides and Fungicides
- Phenylalanin, Phenylamine
- Phthalates
- Polybrominated biphenyls
- Polycyclic aromatic hydrocarbons (PAHs)
- Polyvinylchloride (PVC)
- Primary aromatic amines and azo colorants which may cleave to form aromatic amines as listed in European regulation 1907/2006/EC (REACH)
- Radioactive materials, radioactive contamination
- Rayon
- Resorcinol (CAS No. 108-46-3)
- Rice plant derived substances
- Seed-bearing parts of a flowering plant (fruits)
- Sodium Antimonate A (CAS 15432-85-6)
- TAA Titanium Acetylacetonate (CAS 17501-79-0)
- Thiuram (CAS 137-26-8)
- Toluene (CAS 108-88-3 )
- Triclosan (CAS 3380-34-5)
- Tris(4-nonylphenyl, branched and linear) phosphite
- 2,2,4-Trimethyl-1,3-pentandioldiisobutyrate (CAS 6846-50-0)
- Vinyl chloride (CAS 75-01-4)
- Volatile Organic Compounds
- Yeast
- TNPP, 4 NP and NPE



## 8. Disclaimer

### Disclaimer

This declaration is restricted to the above mentioned product in the state it is delivered by us. This information provided in this statement applies only for the above mentioned product and may not substitute necessary end use testing. Sappi 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 *Magno Satin* for a particular application or end use. The information given in this statement has been verified by Sappi 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. Republishing this document is not permitted.



## Vyhlásenie o zhode

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**Názov produktu:** Magno Satin

**Popis produktu:** Natieraný jemný papier

### 1. Všeobecné informácie

- **Zloženie buničiny:** Vyššie uvedený produkt sa vyrába zo zmesi bezchlórovo bielenej chemickej buničiny typu ECF (bez použitia elementárneho chlóru) a TCF (celkovo bez použitia chlóru). Výroba je založená výhradne na primárnych vláknach a na prípravu buničiny sa nepoužívajú žiadne recyklované vlákna. Ďalej potvrdzujeme, že produkt sa vyrába bez zámerného pridávania akýchkoľvek recyklovaných materiálov.
- **Obsah kyselín / obsah chloridov:** pH produktu Magno Satin je vyššie ako 7. Magno Satin možno opísať ako neutrálny alebo mierne alkalický. Nebol testovaný na obsah chloridov.
- **Výrobný závod:** Magno Satin sa vyrába v závodoch Eningen, Gratkorn alebo Maastricht.

### 2. Status pre kontakt s potravinami

- **Podmienky pre kontakt s potravinami:** Magno Satin bol posúdený akreditovaným laboratóriom z hľadiska vhodnosti pre kontakt s potravinami. Podľa certifikátu vydaného laboratóriom môže byť použitý na dlhodobý kontakt (maximálne 2 roky) pri izbovej teplote. Môže sa použiť aj na krátkodobý kontakt (maximálne 2 hodiny) pri teplotách do 90 °C (uchovávanie a ohrev potravín) v súlade s odporúčaním XXXVI úradu BfR. Môže sa používať v priamom kontakte s suchými potravinami. Okrem toho môže prísť do kontaktu s takými tukovými potravinami, ktorým bol pridelený korekčný faktor najmenej 3 podľa prílohy III, tabuľky 2 nariadenia Komisie (EÚ) č. 10/2011.
- **Súlad s nariadením (ES) č. 1935/2004:** Magno Satin bol posúdený akreditovaným laboratóriom a zistilo sa, že spĺňa požiadavky rámcového nariadenia (ES) č. 1935/2004 o materiáloch a predmetoch určených na kontakt s potravinami. Magno Satin sa môže použiť ako obal na potraviny, ako je uvedené na certifikáte pre kontakt s potravinami.
- **Súlad s nariadením (ES) č. 2023/2006:** Magno Satin bol vyrobený v súlade s nariadením Komisie (ES) č. 2023/2006 o dobrej výrobní praxi pre materiály a predmety určené na kontakt s potravinami. Úplná sledovateľnosť surovín je možná prostredníctvom IT systémov. Výrobný závod má zavedený systém manažérstva kvality podľa normy ISO 9001, ktorý je externej certifikovaný.
- **Súlad s odporúčaním BfR XXXVI:** Magno Satin spĺňa požiadavky stanovené v odporúčaní Nemeckého spolkového inštitútu pre posudzovanie rizík (BfR) XXXVI

„Papier, Kartons und Pappen für den Lebensmittelkontakt“ (Papier a lepenka pre kontakt s potravinami).

- **Súlrad so zákonom o potravinách a krmivách (LFGB):** Magno Satin je v súlade s pravidlami aktuálnej verzie Zákonníka o potravinách, spotrebnom tovare a krmivách (LFGB).
- **Súlrad s požiadavkami FDA pre obaly potravín:** Magno Satin nebol posudzovaný podľa požiadaviek kódexu CFR (Code of Federal Regulations), Foods and Drugs (FDA), 21 CFR Ch. 1 (verzia z apríla 2024), §§ 176.170 a 176.180.
- **Súlrad so švajčiarskym nariadením o obalových materiáloch pre potraviny:** Magno Satin spĺňa požiadavky stanovené vo švajčiarskom nariadení o materiáloch a predmetoch (SR 817.023.21), časť 9, článok 27. Obsahuje výhradne primárne vlákna a žiadne recyklované vlákna.
- **Súlrad s nariadením (EÚ) č. 10/2011:** Magno Satin nespadá do rozsahu pôsobnosti nariadenia Komisie (EÚ) č. 10/2011 o plastových materiáloch a predmetoch určených na kontakt s potravinami, keďže ide o neplastový materiál.
- **Francúzske nariadenie Fiche MCDA n°4 (V02 – 01/01/2019):** Vyššie uvedený produkt nebol posudzovaný z hľadiska súladu s francúzskym nariadením Fiche MCDA n°4 ani s inou francúzskou legislatívou.

### 3. Bezpečnosť hračiek

- **Smernica EÚ o bezpečnosti hračiek:** Magno Satin spĺňa požiadavky smernice Európskeho parlamentu a Rady 2009/48/ES o bezpečnosti hračiek v znení neskorších predpisov pre zotreté materiály hračiek, pokiaľ ide o ich chemické vlastnosti. Môže sa bezpečne používať v hračkách pre deti staršie ako 3 roky a v hračkách, ktoré nie sú určené na vkladanie do úst.
- **Bezpečnosť hračiek EN 71-3:** Magno Satin bol testovaný a spĺňa požiadavky najnovšej verzie normy o bezpečnosti hračiek EN 71-3: „Migrácia určitých prvkov“.
- **Bezpečnosť hračiek EN 71-9:** Magno Satin bol testovaný a spĺňa požiadavky normy o bezpečnosti hračiek EN 71 časť 9:2005: „Organické chemické zlúčeniny“. Koncentrácia formaldehydu podľa potvrdzujúcich skúšok EN 645 a EN 1541 bola nižšia ako limit 30 mg/kg.

### 4. Relevantná legislatíva

- **Súlrad s nariadením (ES) č. 1907/2006 (REACH):** Nariadenie REACH sa vzťahuje najmä na chemické látky, zmesi a predmety uvádzané na trh v EÚ / EHP. Registračné povinnosti podľa REACH sa vzťahujú na chemické látky ako také, a preto sa nevzťahujú na samotný papierový produkt uvádzaný na trh spoločnosťou Sappi. Všetky registračné povinnosti, ktoré sa vzťahujú na suroviny používané pri výrobe, spĺňajú naši dodávatelia. Podľa našich najlepších vedomostí sa v produkte nenachádzajú žiadne látky zo zoznamu kandidátov SVHC ani z prílohy XIV (autorizácia) v koncentráciách > 0,1%. Zohľadnené boli aktualizácie zoznamu SVHC do 4. februára 2026 vrátane.
- **Súlrad s Nariadením (EÚ) 2025/40 (PPWR):**
  - **Článok 5 ods. 4:** Magno Satin spĺňa požiadavky na minimalizáciu obávaných látok (ťažkých kovov).

- **Článok 5 ods. 5:** Pri výrobe sa zámerne nepridávajú látky PFAS. Produkt bol analyzovaný podľa postupu odporúčaného v pokynoch pre PPWR a spĺňa stanovené požiadavky.
- **Článok 6 (Recyklovateľnosť):** Recyklovateľnosť produktu Magno Satin bola preukázaná. Požiadavky normy EN 13430:2004 sú splnené. Údaje platia pre papier v stave dodanom zo závodov Sappi pred ďalším spracovaním.
- **CONEG:** Magno Satin spĺňa požiadavky modelovej legislatívy CONEG. Súčet ťažkých kovov Cr(VI), Pb, Cd a Hg je nižší ako 100 ppm.
- **Séria noriem EN 13427:** Ak sa produkt používa ako súčasť obalu, nasledujúce vyhlásenia môžu slúžiť ako podklad pre výrobcu finálneho obalu:
  - **EN 13427:** Stanovuje postup kombinácie aplikácie noriem.
  - **EN 13428:** Vyrába sa bez použitia zberného papiera; použitie nebezpečných chemikálií bolo minimalizované; súčet ťažkých kovov je pod 100 ppm.
  - **EN 13429:** Nie je priamo aplikovateľné, závisí od vlastností finálneho obalu.
  - **EN 13430:** Plne recyklovateľný.
  - **EN 13431:** Prispieva k pozitívnej výhrevnosti pri energetickom zhodnocovaní, odporúča sa však uprednostniť materiálovú recykláciu.
  - **EN 13432:** Netestované pre túto časť. Odporúča sa recyklácia pred kompostovaním.
- **Súlad so smernicou 2011/65/EÚ (RoHS):** Obmedzené látky podľa smernice RoHS (a jej zmien 2015/863 a 2017/2102) neboli zámerne pridané do výrobného procesu a neočakáva sa ich výskyt nad povolenými prahovými hodnotami.
- **Kalifornský zákon Proposition 65:** Látky zo zoznamu Proposition 65 (aktualizovaného do 5. decembra 2025) sa zámerne nepridávajú.
- **Kanadský zákon o ochrane životného prostredia (CEPA):** Látky uvedené v CEPA 1999 sa zámerne nepridávajú.

## 5. Rôzne

- **Riziko BSE/TSE:** Suroviny živočíšneho pôvodu klasifikované ako rizikové podľa nariadenia (ES) č. 1326/2001 sa nepoužívajú. Pre pomocné látky (napr. odpeňovače) máme vyhlásenia dodávateľov vylučujúce riziko TSE.
- **Látky živočíšneho pôvodu:** Prítomnosť stopových množstiev látok živočíšneho pôvodu nie je možné úplne vylúčiť.

## 6. Informácie o scenároch konca životnosti

- **Recyklovateľnosť:** Produkt je plne recyklovateľný v prúde zberného papiera. Pre hypotetický obal pozostávajúci len z tohto materiálu je možné priradiť recyklačný kód **PAP 22** podľa 97/129/ES.
- **Biologická odbúrateľnosť:** Produkt nebol testovaný na kompostovateľnosť. Obsahuje fosílny polymérny spojivá v množstve nad 1 %. Odporúča sa uprednostniť recykláciu pred kompostovaním.

## 7. Nepoužitie a použitie špecifických látok alebo materiálov

- **Geneticky modifikované organizmy (GMO):** Zámerne sa nepridávajú.
- **MOSH/MOAH (minerálne oleje):** Nepoužívajú sa ako surovina. Stopy z odpeňovačov či stabilizátorov však môžu viesť k pozitívnemu výsledku pri analýze MOSH.
- **Antrachinón (CAS 84-65-1):** Nepridáva sa pri výrobe.
- **Nanomateriály:** Suroviny ako uhlíčitý vápenatý môžu obsahovať častice v nanorozsahu. Sú však pevne zabudované v papierovej matrici a neočakáva sa ich migrácia.
- **Alergény:** Zámerne sa nepridávajú žiadne alergény podľa nariadenia EÚ 1169/2011 okrem pšeničného škrobu, ktorý môže obsahovať lepková zložky.
- **Perzistentné organické znečisťujúce látky (POPs):** Žiadne z látok uvedených v prílohách Štokholmského dohovoru (aktualizovaného v roku 2025) alebo nariadení (EÚ) 2019/1020 nie sú zámerne pridávané.
- **Oxidy titánu:** Zámerne sa nepridávajú.
- **Opticky zjasňujúce prostriedky (OBA):** Zámerne sa používajú v súlade s odporúčaniami BfR a legislatívou FDA.
- **PVDC / PVC:** Zámerne sa nepridávajú.
- **Konfliktné minerály:** Zlato, cín, tantal ani wolfrám sa pri výrobe nepoužívajú.
- **Látky CMR (CLP):** Zámerne sa nepridávajú žiadne karcinogénne, mutagénne alebo reprotoxické látky.
- **Látky zvyšujúce pevnosť za mokra:** Nepridávajú sa.
- **Zoznam SIN List (ChemSec) / Endokrinné disruptory:** Žiadne zo zoznamov sa nepridávajú zámerne, okrem biocídov (Glutaral, DBNPA), ktoré sa však vo finálnom papieri nedetekujú v dôsledku rozkladu počas vysokých teplôt pri sušení papiera.

## 8. Vyhlásenie o obmedzení zodpovednosti (Disclaimer)

Toto vyhlásenie sa vzťahuje výhradne na produkt v stave, v akom ho dodáva spoločnosť Sappi. Nahradzuje konečné testovanie u používateľa. Spoločnosť Sappi nezodpovedá za škody spôsobené nesprávnym použitím. Vyhlásenie je platné maximálne jeden rok od dátumu vydania, pokiaľ nie je k dispozícii novšia verzia. Opätovné publikovanie tohto dokumentu nie je povolené.