

To: Metsä Tissue

PRODUCT SAFETY STATEMENT

Product Name(s)	Metsä Pine HUS, Metsä Birch HUS
Production Site(s)	Metsä Board Husum Sweden (Pulp)
Product Description	Chemical pulp

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

Metsä Board is a leading European producer of premium fresh fibre paperboards. All our paperboards and pulps are made from fresh fibres, which can be traced back to their source in sustainably managed northern forests. Products are manufactured in Metsä Board production sites in compliance with good manufacturing practice and quality management system certified according to ISO 9001, ISO 14001, ISO 45001, ISO 50001, ISO/FSSC 22000, PEFC (02-31-92) and FSC® (C001580)

FOOD CONTACT

Declaration of Compliance

We hereby state that this product is in compliance with the following food contact regulations and recommendations. The informed compliance applies to both sides of the product, unless otherwise is stated. The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations listed below. Additionally, the compliance evaluations are based on the declarations of compliance provided by our raw material suppliers, and complementary information obtained on a confidential basis.

The trade name(s) mentioned above are suitable for food contact as described below.

EU:

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:

BfR (Bundesinstitut für Risikobewertung) XXXVI Paper and board for food contact	Complies when applicable and under foreseeable conditions of use
BfR (Bundesinstitut für Risikobewertung) XXXVII/1 Cooking papers, hot filter papers and filter layers	Complies when applicable and under foreseeable conditions of use
BfR (Bundesinstitut für Risikobewertung) XXXVII/2 Paper and paperboard for baking purpose	Complies when applicable and under foreseeable conditions of use

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BfR (Bundesinstitut für Risikobewertung) XXXVI/3 Adsorber pads based on cellulosis for food packaging	Complies when applicable and under foreseeable conditions of use
USA:	
The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. § 186.1673 (“Pulp”)	Virgin pulp is explicitly listed as GRAS (Generally Recognized As Safe) for use in the manufacture of food-contact paper and paperboard at levels not to exceed good manufacturing practice.

NON-USE WARRANTY

We hereby warrant that 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 and amendments thereof, or agreement, and never exceeding the threshold limit of 0.1% by weight of the product.

1. Recycled material / synthetic fibres	This product is manufactured from fresh fibres and does not contain any printed recycled material or synthetic fibres.
2. Heavy metals	<p>No heavy metals are intentionally added during the manufacturing process.</p> <ul style="list-style-type: none"> Heavy metal traces are under the limits regulated in Finnish legislation 268/1992 <p>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</p> <ul style="list-style-type: none"> Directive 94/62/EC on Packaging and Packaging Waste and its amendments. TPCH (CONEG): The Model Toxics in Packaging Legislation <p>This product is in compliance with EN 13432 (Packaging – Requirements for packaging recoverable through composting and biodegradation), Annex A. Table A.1. concerning heavy metals and other toxic and hazardous substances</p>
3. Genetically modified organisms (GMO)	<p>No genetically modified organisms (GMO) are used as raw materials. 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. No bioengineered foods or substances are used as raw materials. This products is not a bioengineered food or substance as defined by 7 C.F.R. §66.1.</p>
4. Fluorine	<p>Fluorinated chemicals, per- and polyfluoroalkyl substances (PFAS), including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid and its derivatives (PFOS), are not used in the manufacturing of the product.</p>
5. Animal origin, Halal, Kosher	<p>Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.</p>
6. Conflict minerals	<p>Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacturing of the product.</p>

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	<p>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.</p>
7. POP Regulation and brominated flame retardants	<p>Substances listed in the Regulation (EU) No 2019/1021 on persistent organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).</p> <p>Directive 2002/95/EC (RoHS) and 2011/65/EU (RoHS 2 Annex II) as amended on the restrictions of the use of certain hazardous substances in electrical and electronic equipment.</p>
8. Ozone depleting substances	<p>Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer. Substances listed in Montreal Protocol 1987.</p>
9. UNEP 12 Chemicals, Persistent organic pollutants	<p>Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment Programme 1997.</p>
10. Bisphenols and Epoxy derivatives	<p>Bisphenol A (BPA) Bisphenol S (BPS) Bisphenol F (BPF) 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.</p>
11. Optical brightening agents	<p>Optical brightening agents (OBA) are not used in the manufacturing of the product.</p>
12. Other substances of concern	<p>Anthraquinone Asbestos Azocolourants and azodyes Benzophenone, hydroxybenzophenone, methoxybentsophenone and 4-methylbenzophenone Butylated hydroxyanisole (BHA) Butylated hydroxytoluene (BHT) Colophony Creosote Diethylhexyladipate (DEHA) Fragrances Isopropylthioxanthone (ITX) Melamine Natural rubber latex materials Nitrocellulose and nitrosamines Nonylphenols and nonylphenol ethoxylates Pentanedione-2,4-titanium Phthalates Polycyclic aromatic hydrocarbon (PAH) Polyvinylchloride (PVC) and polyvinylidene chloride (PVDC) Resorcinol Titanium dioxide Triclosan</p>

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ECF

This pulp is produced with ECF (elemental chlorine free) process, meaning no chlorine gas (Cl₂) is used.

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, and amendments thereof, are used.

This product complies 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 as raw materials.

According to REACH Regulation chemical 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 this information this product does not contain Substances of Very High Concern above the reporting limit of 0.1%.

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 this product. This includes for example cereals, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, lupin and molluscs.

ENDOCRINE DISRUPTING CHEMICALS (EDC)

The product does not contain components considered to have endocrine disrupting properties according to REACH Article 57(f) or Commission Delegated Regulation (EU) 2017/2100 or Commission Regulation (EU) 2018/605 or I and II of Article L. 5232-5 of the French Public Health Code (as established in Order of September 28, 2023) above the limit of 0.1%.

BIOCIDAL PRODUCTS

According to Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, this product is not defined as a treated article.

Biocides are used in the manufacturing process of this product to prevent harmful microbiological growth and to ensure the microbiological purity of the final product. No surface biocides are used and the transfer of antimicrobial constituents from the final product is tested in a third party laboratory to ensure no antimicrobial effect.

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ADDITIONAL COMPLIANCE INFORMATION

This product complies with the following:

- BfR Guidelines for the evaluation of sanitary and personal sanitary products (Bundesgesundheitsbl. 39 (1996) 123 and 724)
- EN 71-3 Safety of toys — Part 3: Migration of certain elements

DISCLAIMER

The information provided in this statement applies only for the paperboard, barrier coated paperboard or pulp material as delivered by Metsä Board Corporation and may not substitute necessary end use testing. Metsä Board Corporation 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 Board Corporation 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 BOARD CORPORATION

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