



DECLARATION OF COMPLIANCE FOR FOOD CONTACT MATERIALS

1. Producer and signatory identity

M. Michelangelo Anderlini

Role : Technical Director

Producer : BIOPAP Srl Società Benefit, Via Edison 237 – 20019 Settimo Milanese (MI) Italy

2. Material identification

Description Food wrapping paper

Reference: BIOPAP® WRAP

Material Structure:

BIOPAP® WRAP is made out of pure bleached pulp paper (ECF) with a barrier coating enhancing moisture and grease resistance for food contact.

The barrier is made out of a water-based emulsion that is crystallized and dried on the paper surface by infrared rays.

Declaration Date : 03/07/2025

3. Material Conformity

BIOPAP® WRAP is suitable for direct food contact on the barrier side, with dry, moisty, acid, low alcoholic, dairy and fatty foods on the unprinted side, in a temperature range from -25°C to +25°C according to:

- *Italian DM 21-03-1973 and subsequent updates
- *Reg. CE 1935/2004
- *Reg. UE 10/2011 and subsequent updates
- * Italian DPR 777/82 and subsequent updates
- *German BfR, Recommendation XXXVI on paper and board for food contact
- *Directive CE 2023/2006 (GMP) and following the guidelines of the BRC IOP (packaging) and USA GMP requirement (21 CFR 110)
- *FDA Regulations, 21 CF Regulations part 176.170 and 176-180 Paper and paperboards

The overall migration limits and possible specific restrictions are conforming to the standards in following test conditions based on the raw materials suppliers' Food Contact Declaration and as test report 1263\FPM\FDC\25; 1263\FPM\FDC\25_2; 1263\FPM\FDC\25_3 dated 03/07/25:

OML	Simulant	Time/Temperature	OM [mg/dm ²]	Limit [mg/dm ²]
	Oliv oil	10 days 5°C	<1	10
	Ethanol 50%	10 days 20°C	7,1	10
	Acetic acid 3%	10 days 20°C	<1	10

SML	Substance	CAS No.	SML
	Methyl methacrylate	80-62-6	6 mg/kg
	2-ethylhexyl acrylate	103-11-7	0,05 mg/kg
	Ammonia	1336-21-6	
	Poly (oxy-1,2-ethanediyl), a-undecyl-w-hydroxy-, branched and kinear	127036-24-2	1,8 mg/kg
	BIT	2634-33-5	0,5 mg/kg
	Deamineralised water	7732-18-5	
	Poly (oxy-1,2-ethanediyl), α -(1-oxooctadecen-1-yl)- ω -[(1-oxooctadecen-1-yl)oxy]-	52668-97-0	$\geq 5-10$ (%w/w)
	Talc	14807-96	$\geq 96\%$
	Isopropylalcohol	67-63-0	$\leq 100\%$
	1,2-benzisothiazolin-3-one	2634-33-5	≤ 10 mg/dm ²

-Suitable for food wrapping of all kinds of food in freezer, refrigerator and at room temperature for short periods. Food contact to be on the barrier side.

During the manufacturing of the above mentioned product, we do not intentionally use or add any of the following substances. Please, note that we do not analyze the substances listed below:

Alkylphenols
Anthraquinon
Biocides
Bisphenol A, F or S
Brominated flame retardants (PBB, PDDE)
BSE/TSE (Bovine spongiform encephalopathy)
Dioxins
Fluorine or polyfluorinated surfactants
Food allergens
Formaldehyde
GMO (Genetically Modified Organisms)
MOSH, MOAH (Mineral Oils)
Nanoparticles
Parabens
PCP, PCB (Polychlorinated biphenyls)
Phenol or derivatives
Phthalates
Polycyclic Aromatic Hydrocarbons
Primary aromatic amines
PVC
SVHC "Substances of Very High Concern"

Based on our safety assessment of the raw material and its potential impurities, reaction-and degradation products (non-intentionally added substances-NIAS) using compositional information provided to us by raw material supplier, and provided that good manufacturing practice (GMP) is applied during processing of raw material, we can confirm that the coating of raw material is in compliance with the relevant requirements of the Regulation (EC) 1935/2004.

- Dual Use Substances:

Not present in best of our knowledge.

We are not in the position to take full commitment to the substances in raw materials for which legal requirements for disclosure do not exist and have not been disclosed by our suppliers.

The product confirm to Commission Directive 94/62/EC and its amendments on packaging and packaging waste. The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium is less than 100 ppm by weight.

- Heavy Metals:

Conformity established through ICP analysis with acid extraction, test report 2020-0523 E

Substance	Limit mg/kg	Result mg/kg of food
Aluminium	1	0,836
Arsenic	0,01	0,001
Baryum	1	0,001
Cadmium	0,002	0,00002
Cobalt	0,05	0,0002
Chromium	0,01	0,0008
Copper	5	0,011
Iron	48	0,067
Mercury	0,01	<0,0001
Lithium	0,6	0,00005
Manganese	0,6	0,005
Nickel	0,02	0,003
Lead	0,01	0,0005
Antimony	0,04	0,00002
Zinc	5	0,004

4. Information relevant for the final use of the material

Wrapping paper covered by this declaration is suitable for direct food contact on the barrier side, with dry, moisty, acid, low alcoholic, dairy and fatty foods.

Suitable for food wrapping of all kinds of food in freezer, refrigerator and at room temperature for short periods.

5. Percentage of non-fossil based carbon

Percentage of bio-based carbon in BIOPAP® WRAP > 97%



6. Other Information

- Forest Certification/Origine – Conformity to Reg. EU n°2023/1115
100% of BIOPAP® packaging solutions produced are certified PEFC®. Forest based raw materials are only sourced from certified well managed forests and 100% of forest-based purchased materials are PEFC® Certified. BIOPAP® is audited every year.
- Printing :
BIOPAP® WRAP is printed on the outside with inks and lacquer compliant with food packaging applications and compliant with EuPIA April 2024 good practices. Food contact should never be made on the printed side.
- Nano components
Based on the current information received from our suppliers, no substances in nanoscale form are used as a component or intentionally added to production recipes.
- REACH
According to current information received from our suppliers, only chemical components compliant with REACH regulation (EC) No. 1907/2006 are used in the production recipes. In particular, the substances of Annex XIV and Annex XVII of this Regulation are not present in the manufacturing recipes.
- The product is suitable for recovery by:
Material recycling (EN 13430)
Energy recovery (EN 13431)
Compositing and biodegradation (EN 13432)

This declaration is valid only for the material or object as delivered (tray/packaging) and as long as there is no regulatory modification or change likely to result in a modification of the inertia of the material or of the item.

In any case, compliance is undertaken only with proper conditions of storage, handling and use, taking into account the particular characteristics of the material or object and as set for by usage or professional codes.

In the event of a change in the characteristics of the packed product, its composition or its destination, as well as in the event of a change in the conditions of use of the material or article, the person to whom this declaration is made must ensure the compatibility Food/Packaging for which he assumes the sole responsibility



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