

**Dr. Ralph Derra**Öffentlich bestellter und vereidigter Sachverständiger für  
Verpackungsmaterialien, Boden- und Luftanalysen;  
Sachverständiger in der Wasseranalytik

28 October 2021

Dr. Dr/Ils-kr

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITEeingetragen  
registered no.  
registré

55714 U 21

für  
for  
pourDr. Franz Feurstein Gesellschaft m.b.H.  
Fabrikstrasse 20  
4050 Traun  
AustriaProdukt  
Product  
Produitthintwist®  
thintwist® SC  
thintwist® coat  
thintwist® SO

The products manufactured by the company mentioned above are paper grades which are used for food packaging.

They were examined by us according to the

"Methoden zur Untersuchung von Papieren, Kartons und Pappeln für Lebensmittelverpackungen", Stand 2008, entsprechend der Vorschrift Nr. 80.56 in der Amtlichen Sammlung von Untersuchungsverfahren nach § 64 des Lebensmittel- und Futtermittelgesetzbuchs - LFGB,

("Methods for testing papers and boards for food packaging", state of 2008, corresponding to the method no. 80.56 within the Official Collection of Test Methods according to § 64 of the Foodstuffs and Animal Feed Code - LFGB),

as well as to the specific requirements of the

Page 1 of 6

Guidelines of the Council of Europe on test conditions and methods of analysis for paper and board materials and articles intended to come into contact with foodstuffs, Technical Document no. 2, version 3 of 14 November 2007,

and according to the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2021 edition),  
§ 176.170,

for the used raw materials, fabrication additives and special paper finishing agents as well as for the release of substances which might endanger health.

In addition, the heavy metal content was examined according to the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as to the

Model Toxics Legislation as developed by the Source Reduction Council of December 14, 1989, last modification of December 2008.

The paper grades are in compliance with the rules of the

Regulation (EC) No 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 and repealing Directives 80/590/EEC and 89/109/EEC, Official Journal of the European Union L 338/4 of 13.11.2004, modified by app. no. 5.17 of the regulation (EC) No 596/2009 of 18 June 2009, Official Journal of the European Union L 188 of 18 July 2009, article 3, 1. (a) and (b),

as well as of the

Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 3. Juni 2013 (BGBl. I S. 1426), zuletzt geändert durch Artikel 10 des Gesetzes vom 21. Mai 2021 (BGBl. I S. 1087), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 3 June 2013 (BGBl. p. 1426), last amendment by article 10 of the law of 21 May 2021 (BGBl. I p. 1087), §§ 30 and 31),

and are approved according to the

BfR-Empfehlung XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt, neu gefasst durch 62. Mitteilung, Bundesgesundheitsblatt 14 (1971) 83, zuletzt geändert durch 223. Mitteilung, Bundesgesundheitsblatt 64 (2021) 764, Stand vom 01.04.2021,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 223<sup>rd</sup> Announcement, Bundesgesundheitsblatt 64 (2021) 764, as of 1 April 2021).

Therefore, the paper grades are also in compliance with the regulation of the

Statutory Instruments 2012 No. 2619 Materials and Articles in Contact with Food (England) Regulations 2012 (state of 20 November 2012), Part 2, Section 4 (1),

and of the

Scottish Statutory Instruments 2012 No. 318 Materials and Articles in Contact with Food (Scotland) Regulations 2012 (state of 28 March 2019), Part 2, Section 4 (1),

as well as of the

Welsh Statutory Instruments 2012 No. 2705 (W.291) Materials and Articles in Contact with Food (Wales) Regulations 2012 (state of 26 July 2018), Part 2, Section 4 (1),

and also of the

Statutory Rules of Northern Ireland 2012 No. 384 Materials and Articles in Contact with Food Regulations (Northern Ireland) 2012 (state of 20 November 2012) Part 2, Section 4 (1).

The demands of the

Resolution of the Council of Europe AP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs of 18 September 2002,

are met by the paper grades. Instead of the not yet evaluated Technical Document 1 on constituents, the list of fabrication additives of the German Recommendation XXXVI was consulted.

In addition, they are in compliance with the demands of the

Directive 94/62/EC of the European Parliament and of the Council of 20 December 1994, on packaging and packaging waste, Official Journal of the European Communities L 365/10 of 31 December 1994, last amendment by the Directive (EU) 2018/852 of the European Parliament and of the Council of 30 May 2018, Official Journal of the European Union L 150/141 of 14 June 2018,

as well as of the

Model Toxics Legislation as developed by the Source Reduction Council of CONEG of December 14, 1989, last modification of December 2008,

regarding the heavy metal contents.

Furthermore the paper grades are in compliance with the Swiss regulations of the

SR 817.02 Lebensmittel- und Gebrauchsgegenständeverordnung (LGV) vom 16. Dezember 2016, (Stand am 1. Juli 2020), Artikel 49,

(SR 817.02 Ordinance on Foodstuffs and Utility Articles (FUAO) of 16 December 2016 (state on 1. July 2020), article 49),

as well as of the

SR 817.023.21 Verordnung des EDI über Bedarfsgegenstände vom 16. Dezember 2016, (Stand am 1. Dezember 2019), Artikel 27.

(SR 817.023.21 Ordinance of the FDHA on Materials and Articles of 16 December 2016 (state on 1 December 2019), article 27).

Additionally, the paper grades meet the requirements of the

Fiche MCDA n°4 (V02 – 01/01/2019) Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires,

(MCDA Sheet 4 (V02 - 01/01/2019) Food contact ability of organic materials based on plant fibres intended to come into contact with foodstuffs),

as well as the rules of the

Décret n° 2007-766 du 10 mai 2007 portant application du code de la consommation en ce qui concerne les matériaux et les objets destinés à entrer en contact avec les denrées, alimentaires, dernière modification par le décret n° 2011-385 du 14 avril 2011,

(Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011-385 of 14 April 2011).

Furthermore the paper grades are in compliance with the demands of the

Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2021 edition), §§ 176.170 and 176.180.

Thus the paper grades **thintwist®**, **thintwist® SC**, **thintwist® coat** and **thintwist® SO** according to the sample material submitted may be used safely for food packaging.

The paper grades **thintwist®**, **thintwist® SC** and **thintwist® SO** may stand in direct contact with dry, moist and fatty foodstuffs.

The paper grade **thintwist® coat** may stand in direct contact with dry and moist foodstuffs. Furthermore, the paper grade may stand in direct contact with fatty foodstuffs, which were assigned to a correction factor of at least 2 according to Annex III, table 2 of Commission Regulation (EU) No. 10/2011.

This certificate of compliance has a validity of 2 years and consists of 6 pages.

Certification decision



staatlich anerkannter Sachverständiger  
zur Untersuchung der Gegenstände von  
Verpackungsmaterialien aus Papier, Pappe  
und Kunststoffen, Glas, Weißblech und  
sonstigen Materialien bezüglich ihrer  
niederschlagsfesten und unbedenklichen  
Verwendung im Lebensmittelbereich

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 6.  
La traduction des estampilles est donnée en page 6.



**Staatslich anerkannter Sachverständiger zur Untersuchung der Gegenproben von Verpackungsmitteln aus Papier, Pappe, Kunststoffen, Glas, Weißblech und sonstigen Metallverpackungen auf ihre Lebensmittelrechtliche Unbedenklichkeit**

Dr. Ralph Derra

Authorized expert for the analyses of packaging materials, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse des matériaux d'emballage, asservementé par la Chambre d'Industrie et de Commerce d'Aschaffenburg.



State registered expert for the analysis of contrasting samples of packaging materials of paper, board, plastics, glass, tin plate and other metallic packaging materials as to their suitability for use with foodstuffs.

Expert public pour l'étude du contrôle des contre-échantillons d'emballages de papier, cartons, plastiques, verre, fer-blanc et d'autres emballages métalliques concernant leur conformité alimentaire.

Dr. Ralph Derra

Authorized expert for the analyses of soil and air, attested by the Aschaffenburg Chamber of Industry and Commerce.

Expert autorisé pour l'analyse du sol et de l'air, asservementé par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

---

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
Dieses Dokument ist eine Übersetzung einer deutschen Originalversion. In Streitfällen ist das Originaldokument die rechtlich bindende Version.

A file sample of the tested material is kept at the expert's office.

This document is a translation of an original in German. In case of dispute, the original document should be taken as authoritative.