

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

23 July 2024  
Dr. Dr/Ils-kr

UNBEDENKLICHKEITSERKLÄRUNG  
CERTIFICATE OF COMPLIANCE  
CERTIFICAT DE CONFORMITE

eingetragen  
registered no.  
registré

62521 U 24

für  
for  
pour

ALIER S.A.  
Avenida Diagonal 403 6-3  
08008 Barcelona  
Spain

Produkt  
Product  
Produit

ES "Ecokraft Sacks"

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us under consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 26.02.2015,

(BfR-“Collection of methods for the examination of paper and board for food contact” of the, current state), in connection with the BfR guideline "Examination of the transfer of substances from consumer products made of paper and board", as of 26.02.2015),

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

Furthermore, a determination of the heavy metal contents was performed on the basis 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.

The paper grade is 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, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, 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 15. September 2021 (BGBI. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBI. 2024 I Nr. 149), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBI I. p. 4253; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBI. 2024 I no. 149), §§ 30 and 31),

and is 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 226. Mitteilung, Bundesgesundheitsblatt 66 (2023) 216-217, Stand vom 01.02.2023,

(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

Furthermore, the paper grade is 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.

Thus the paper grade **ES "Ecokraft Sacks"** according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



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

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**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 Chamber of Industry and Commerce.

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



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, asservié par la Chambre d'Industrie et de Commerce d'Aschaffenburg.

Die Rücklagen des untersuchten Materials werden bei der Gutachterstelle verwahrt.  
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Produkt  
Product  
Produit

Bolsas Kraft (AB)

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us under consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 26.02.2015,

(BfR-“Collection of methods for the examination of paper and board for food contact” of the, current state), in connection with the BfR guideline “Examination of the transfer of substances from consumer products made of paper and board”, as of 26.02.2015),

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

Furthermore, a determination of the heavy metal contents was performed on the basis 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.

The paper grade is 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, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, 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 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl I, p. 4253; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31),

and is approved according to the

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(BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62<sup>nd</sup> An- nouncement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 226<sup>th</sup> Announcement, Bundesgesundheitsblatt 66 (2023) 216-217, as of 1 February 2023).

Furthermore, the paper grade is 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.

Thus the paper grade **Bolsas Kraft (AB)** according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



amtlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln auf Papier, Pappa,  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**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 Chamber of Industry and Commerce.

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23 July 2024  
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für  
for  
pour

ALIER S.A.  
Avenida Diagonal 403 6-3  
08008 Barcelona  
Spain

Produkt  
Product  
Produit

EB "EcoKraft Bags"

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us under consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 26.02.2015,

(BfR-“Collection of methods for the examination of paper and board for food contact” of the, current state), in connection with the BfR guideline “Examination of the transfer of substances from consumer products made of paper and board”, as of 26.02.2015),

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

Furthermore, a determination of the heavy metal contents was performed on the basis of the

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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.

The paper grade is 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, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, article 3, 1. (a) and (b),

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Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (Lebensmittel- und Futtermittelgesetzbuch - LFGB) in der Fassung der Bekanntmachung vom 15. September 2021 (BGBl. I S. 4253; 2022 I S. 28), zuletzt geändert durch Artikel 11 des Gesetzes vom 6. Mai 2024 (BGBl. 2024 I Nr. 149), §§ 30 und 31,

(Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021 (BGBl I. p. 4253; 2022 I p.28), last amended by article 11 of the act of 6 May 2024 (BGBl. 2024 I no. 149), §§ 30 and 31).

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Furthermore, the paper grade is in compliance with the demands of the

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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.

Thus the paper grade **EB "EcoKraft Bags"** according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

This certificate of compliance has a validity of 2 years and consists of 4 pages.

Certification decision



staatlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Pappa  
Kunststoffen, Glas, Weißblech und  
sonstigen Materialverpackungen auf ihre  
Lebensmittelrechtliche Unbedenklichkeit

(Höfert)  
Officially certified  
and authorized food  
chemist

The translation of the above stamps is given on page 4.  
La traduction des estampilles est donnée en page 4.



**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

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Öffentlich bestellter und vereidigter Sachverständiger für  
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for  
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Avenida Diagonal 403 6-3  
08008 Barcelona  
Spain

Produkt  
Product  
Produit

SS "Semi extensible Sacks"

The product manufactured by the company mentioned above is a paper grade which is used for food packaging.

It was examined by us under consideration of the

BfR-„Methodensammlung zur Untersuchung von Papier, Karton und Pappe für den Lebensmittelkontakt“, aktueller Stand, in Verbindung mit dem BfR-Leitfaden "Untersuchung der Stoffübergänge von Bedarfsgegenständen aus Papier, Karton und Pappe" vom 26.02.2015,

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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.

The paper grade is 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, lastly modified by article 5 of the Regulation (EU) 2019/1381 of 20 June 2019, Official Journal of the European Union L 231/1 of 6 September 2019, article 3, 1. (a) and (b),

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and is approved according to the

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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.

Thus the paper grade SS "Semi extensible Sacks" according to the sample material submitted may be used safely for food packaging. It may stand in direct contact with dry, non-fatty foodstuffs and such kind of foodstuffs which are peeled, shelled or washed before consumption and may also be used for secondary packaging. For dry, non-fatty foodstuffs with large surfaces, the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be ensured by the use of an appropriate intermediate packaging.

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Certification decision



Rechtlich anerkannter Sachverständiger  
zur Untersuchung der Gegenproben von  
Verpackungsmitteln aus Papier, Peppa  
Kunststoffen, Glas, Weißblech und  
sonstigen Metallverpackungen auf ihre  
lebensmittelrechtliche Unbedenklichkeit

(Höfert)  
Officially certified  
and authorized food  
chemist

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**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 Chamber of Industry and Commerce.

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



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