

Declaration of Compliance

Version 58

November 19th, 2025

<i>Trade Name</i>	PRIMABAKE	
<i>Product description</i>	Baking paper made of virgin pulp and coated on both side with silicone	
<i>Grammage</i>	Range between 30 g/m ² to 57g/m ²	
<i>Coating layer</i>	One side or both sides coated with silicone Coating weights vary depending on the specifications For more information see the technical specification	
<i>Fiber source</i>	Virgin fiber bleached or unbleached from PEFC certified managed forest, FSC® certified forest, pulp certified FSC CW	
<i>Bleaching</i>	All pulps are ECF (Elementary chlorine free) or TCF (Totally chlorine free)	
<i>Production site</i>	Papeteries du Léman C.S 30043 74201 Thonon – FRANCE	Papeteries des Vosges 34, Rue Maurice Mougeot 88600 Laval Sur Vologne - FRANCE

Typical Applications

Primabake paper is intended to be used for baking dry, wet and fatty foodstuffs and for separating frozen food under the following conditions:

- Conventional ovens up to 220°C
- Microwave ovens without time restriction
- Steam, airfryer, frying pan and plancha
- Freezer and fridge under -18°C

The quality of Primabake paper is guaranteed as long as the paper is stored properly: in its original packaging between 5 and 50°C and away from dust, moisture and rain.

Food contact compliance

We confirm that our PRIMABAKE range is manufactured in compliance to the current following regulations regarding the substances and materials intended to be used in contact with food:

- **Regulation (EC) N° 1935/2004** on materials and articles intended to come into contact with food
- **Regulation (EC) N° 2023/2006** on good manufacturing practice for materials and articles intended to come into contact with food
- Germany: **BfR XXXVI** and **XXXVI/2**
- French decrees 2011-385 & 2007-766
- DGCCRF / MCDA Sheet 4 (V02 – 01/01/2019) on Food contact ability of organic materials based on plant fibres intended to come into contact with foodstuffs
- Italy: Ministerial Decree of 21 March 1973
- Spain: Royal Decree 847/2011 & 191/2011
- Swiss: Regulation SR 817.023.21
- Holland: Commodities Act Regulation on packaging and consumer articles
- USA: **FDA 21 CFR § 176-170 & 176-180**
- CFIA: Canadian Food Inspection Agency requirements
- **China GB 9685-2016**: National Standards for the Use of Additives in Food Contact Materials

- **China GB 4806.8-2022:** National Food Safety Standard for Paper & Paperboard in contact with Foodstuffs
- **Mercosur:** GMC/RES No 42/15: Technical Regulation on Cellulosic Materials, Packaging and Equipment in Contact with Food during Cooking or Baking

Storage and handling recommendations

In order to guarantee product quality, the product must be stored indoor in its original wrapping, sheltered from rain and snow. The recommended storage conditions are at a temperature of around 20°C and relative humidity of 50%.

For appropriate converting behavior, it is recommended to store and unwrap the product at least 24h00 in the workshop area, in order to stabilize the paper in moisture and temperature. Remove the first turn of paper before converting it into rolls or format.


If a splice is present in the roll, it will be indicated on the edge by an edible ink. In this case, stop the converting process at its level, remove the splice and restart the converting process.

As the cardboard cores used to roll up Primabake are intended for indirect food contact, it is recommended to leave at least three layers of Primabake after unrolling.

Considering these good practices, Primabake paper can be used 5 years after manufacture.

Disposal and recovery

The Primabake range is suitable for recovery by:

- Material recycling according to EN 13430
Test performed according to CEPI recyclability Test Method Version 3 and standard UNI 11743:2019. Primabake baking paper is classified 'suitable for standard mill recycling at 67/100' according to 4evergreen protocol and as level A for recyclability according to Aticelca Evaluation Method 501:2019.
- Energy recovery according to EN 13431
- Waste recycling: compostable according to EN13432
Certificate of compliance 1495P E 21 available on our www.primabake.com website 

Considering the above points, our Primabake range is compliant with the European Regulation (EU) 2025/40 on packaging and packaging waste.

Purity and Migration tests

Fluorescent whitening agents: Analysis was made by UV irradiation.
PRIMABAKE did not contain optically brightened fibers or agents.

Degradable Compounds containing Nitrogen: After degradation at 220°C, the nitrogen content has been determined after Kjeldahl disintegration by photometry according to DIN 38 406-E5-1. The amount of degradable compounds containing Nitrogen is < 0.025 mg/kg dry matter.

Microbiological and pathogenic analyses

Méthode de test	Unité	Résultat
Analyse des pathogènes – ISO 8784-2005 et NF V08-056 (ISO 7937)		
Escherichia coli – NF EN ISO 16649-3	-	absence
Staphylococci coagulase positive – NF EN ISO 6888-3	-	absence
Salmonella – BKR 23/07-10/11	-	absence
Listeria monocytogenes – BKR 23/02-11/02	-	absence
Bacillus cereus présomptifs à 30°C - BKR 23/06-02/10	-	<1
Analyses microbiologiques – ISO 4833-1 et NF V08-059		
Total flora at 30°C	UFC/cm ²	<1
Yeast at 25°C	UFC/cm ²	<1
Mold at 25 °C	UFC/cm ²	<1

Sensory Analysis for Odour at 220°C: The examination was made on the basis of DIN 10 955.
No formation of odour indication a decomposition of the product could be noticed.

Sensory Analysis: Off-flavour: The examination was made according to EN 1230-2.

The result of the evaluation is < 1.

For information:

- 0 = no perceptible off-flavour
- 1 = off-flavour just perceptible (still difficult to define)
- 2 = moderate off-flavour
- 3 = moderately strong off-flavour
- 4 = strong off-flavour

Compliance with BfR Recommendation XXXVI/2

<u>Heavy metals:</u>	Cadmium	(Cd)	not quantifiable	< 0.001	mg/l water extract
	Mercury	(Hg)	not quantifiable	< 0.001	mg/l water extract
	Chromium	(Cr)	not quantifiable	< 0.004	mg/l water extract
	Lead	(Pb)	not quantifiable	< 0.001	mg/l water extract
	Aluminium	(Al)	not quantifiable	< 0.2	mg/l water extract

Anthraquinone: Analysis has been performed according to SOP 160.200 by means of gas chromatography and mass spectrometric detection.
The amount of Anthraquinone is < 0.13 mg/kg dry matter.

Glyoxal: Analysis has been performed according to the DIN 54603.
The amount of Glyoxal is < 0.005 mg/kg dry matter.

Formaldehyde (methanal): Analysis has been performed according to the acetylacetone method in conformity with DIN EN 1541.
The amount of formaldehyde is < 0.004 mg/kg dry matter.

Pentachlorophenol (PCP): The determination has been performed according to DIN EN ISO 15320 by means of gas chromatography.
The amount of PCP is not determinable < 0,01 mg/kg dry matter

Polychlorinated Biphenyls (PCB): The determination has been performed according to DIN EN ISO 15318 by means of gas chromatography.

2,2',5-Trichlorobiphenyl	not determinable	< 0.01 mg/kg
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2,4,4'-Trichlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',5,5'-Tetrachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',4,5,5'-Pentachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',3,4,4',5'-Hexachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',4,4',5,5'-Hexachlorobiphenyl	not determinable	< 0.01 mg/kg
2,2',3,4,4',5,5'-Heptachlorobiphenyl	not determinable	< 0.01 mg/kg

Transfer of Antimicrobial Constituents: Analysis has been performed according to DIN EN 1104. There is no transfer of antimicrobial constituents and there is no inhibition zone with *Aspergillus niger* and *Bacillus subtilis*.

Extraction tests according to the FDA Regulations

The tests has been performed according to FDA, CFR title 21, Ch.I, § 176.170.

The extraction with Water, 2h at 121°C – The amount of extract is 0,12 mg/sq inch.

The extraction with n-Heptane, 2h at 66°C – The amount of extract is 0,1 mg/sq inch.

Migration tests according to Commission Regulation (EU) 10/2011

The overall migration tests have been performed on representative sample of PRIMABAKE paper according to EN 1186:2022-07, in connection with DIN EN 1186-2:2022-10, DIN EN 1186-3:2022-10 and EN 13130-1:2004-08. The overall migration limit 10mg/dm² stipulated in the Commission Regulation (EU) 10/2011 is not exceeded.

Overall migration aqueous simulant

Testing condition: 8 hours at 60°C - area / Volume: 1dm²/165ml

Food Simulant	Mean value	Limiting value ⁽¹⁾	Conclusion
10% Ethanol	< 2 mg/dm ²	10 mg/dm ²	PASS
3% Acetic acid	3 mg/dm ²	10 mg/dm ²	PASS

(1) According to Regulation (EU) 10/2011

Overall migration Isooctane

Testing conditions: 8 hours at 60°C - area / Volume: 1dm²/165ml

Food Simulant	Mean value	Limiting value ⁽¹⁾	Conclusion
Isooctane	< 2 mg/dm ²	10 mg/dm ² *	PASS

(1) According to Regulation (EU) 10/2011

Overall migration Ethanol95

Testing conditions: 8 hours at 60°C - area / Volume: 1dm²/165ml

Food Simulant	Mean value	Limiting value ⁽¹⁾	Conclusion
Ethanol 95	< 2 mg/dm ²	10 mg/dm ² *	PASS

(1) According to Regulation (EU) 10/2011

* The following analytical tolerances are admitted: 1 mg/dm² in migration tests with aqueous simulants, **3 mg/dm²** in migration tests with rectified olive oil.

With regard to manner and extent of the performed examinations, PRIMABAKE complies with the current legal requirements of Regulation (EC) No. 1935/2004 and of Regulation (EU) 10/2011 and its amendment (EU) 2025/351.

For the evaluation of the food contact, a ratio of the contact surface area to the total weight of the foodstuff of 50dm²/kg was used.

Specific migration into Tenax® (Modified Polyphenylene Oxide: MPPO)

The specific migration tests have been performed on representative sample of PRIMABAKE paper according to DIN EN 14338:2004-03. The overall migration limit 10mg/dm² stipulated in the Commission Regulation (EU) 10/2011 is not exceeded.

specific migration

Testing condition: 2 hours at 175°C – one-sided contact

Food Simulant	Mean value	Limiting value ⁽¹⁾	Conclusion
Tenax®	< 0,05 mg/dm ²	10 mg/dm ²	PASS

(1) According to Regulation (EU) 10/2011

Dual Use Additives

With reference to article 11(3) of the Regulation (EU) 10/2011 as amended, our product contains the following substance(s) which is/are also authorized as food additives by Regulation (EC) 1333/2008 as amended:

FCM	Cas Number	Substance Name	SML (mg/kg)
115	64-19-7	Acetic acid	Ø
553	9004-34-6	Cellulose	Ø
558	9004-62-0	Hydroxyethylcellulose	Ø

Substances and Process (NIAS)

PRIMABAKE fulfils the current requirements of the CONEG regulation and the European Directive 2004/12/CE with regards to the heavy metals content of packaging as well as RoHS requirements (2011/65/EU).

Based on all our knowledge from our raw materials suppliers, on the control of our production process and on our internal traceability we can hereby confirm that the substances listed below are not intentionally added during the production of the paper:

- Fluor and Polytetrafluoroethylene (PTFE)
- Primary Aromatic Amines (PAA)
- Toluene
- Poly and Per-Fluorinated Alkylated Substance PFAS (PFOA, PFOS free) and Gen-X
- Perfluorooctanoic acid (PFOA), its salt and PFOA related substances
- BPA (bisphenol A), BADGE (bisphenol A diglycidyl Ether), BFDGE (Bisphenol F Diglycidyl Ether) nor NOGE (Novolac Glycidyl Ether) nor DEHM (Di (2-ethylhexyl)maleate) and derivatives as defined in regulation (EC) 1985/2005 nor DEHM.
- Melamine (Cyanuramide , Cyanurotriamine)
- Orthophenylphenol (OPP)
- Phtalates (DEHP, DBP, BBP, DINP, DIDP, DNOP) and derivatives as per 2005/84/CE, 2003/368
- Known allergenic components as listed in Regulation (EC) N°1169/2011; in FDA Food Allergen Labelling and Consumer Protection Act (FALCPA)

- Gluten
- Mineral oils (MOSH and MOAH)
- Bromine
- Quilon
- Ozone-depleting substances (low molecular weight CFC, HCFC, HCF or HCs) as additives or within the manufacturing process for those products
- Genetically modified products (GMO)
- Nanomaterials
- Titanium dioxide (TiO₂)
- Chrome of any sorts (Cr)
- PVC and Chloropolymer (PVDC)
- IsopropylThioXanthon (ITX)
- Benzophenone, 4 methyl-benzophenone, 4 hydroxy-benzophenone

Hereby, we confirm that during the whole manufacturing process, our paper is not exposed to ionization treatment. Consequently, our baking paper range PRIMABAKE is in conformity with regards to the European directive 1999/2/CE of the 22nd February 1999.

Additional legislation and regulations

REACH

We hereby confirm that our Primabake do not contain any substances which are classified as carcinogenic – causing cancer of category one and two. We continuously check the development of the EU and UK Candidate List and the substances for authorization and only accept and use chemicals which comply with the REACH requirements. To our knowledge none of our articles contain any Substance of very High Concern that is on the Candidate List in a concentration above 0.1% (W/W).

Consequently, we guarantee that our Primabake product comply with the EU and UK REACH regulation.

California Proposition 65

Based on the elements given by our raw materials suppliers, we can confirm that none of the components entering the composition of our Primabake are present in the list of chemicals known to the State to cause cancer or reproductive toxicity.

TSCA Compliance Certification

We hereby certify that the chemical substances used in the manufacture of our Primabake baking paper are in compliance with the **Toxic Substances Control Act (TSCA, 15 U.S.C. §2601 et seq.)**.

- All substances are listed on the **TSCA Inventory** or exempt from reporting requirements.
- No components are subject to **TSCA §5 SNURs** or **TSCA §6 restrictions**.

Kosher Certificate

The PRIMABAKE range is certified kosher including Passover by the Star K and the Beth Din of Paris.

Halal Certificate

The PRIMABAKE range is certified Halal by European Halal Services.

Certified management systems at the production site

The Papeteries Du Léman site is certified **BRCGS Global Standard** for Packaging and Packaging Materials, issue 6, August 2019 **with grade A** under certificate number 2024/ 109328.3.



The mark of
responsible forestry



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