

**DECLARATION OF COMPLIANCE  
DIRECTIVE 94/62/EC  
HEAVY METALS  
MINIMIZATION OF HAZARDOUS SUBSTANCES  
RECOVERY**

We hereby state that all Paper and Solid Board grades intended for packaging produced by [redacted] mills comply with the "Essential requirements" of Directive 94/62/EC on Packaging and Packaging Waste amended by Directives 2004/12/EC, 2005/20/EC, 2013/2/EU and Regulation (EC) No 219/2009.

**Source reduction – Heavy metals**

We hereby state that all Paper and Solid Board grades intended for packaging produced by [redacted] mills comply with the requirement for heavy metals as drawn up in the European Council Directive 94/62/EC and the amending Directive 2004/12/EC on Packaging and Packaging Waste (completed by EN 13428 & CR 13695 parts 1 & 2):

- Lead, Cadmium, Mercury and hexavalent Chromium have not been intentionally introduced during the manufacture of these papers.
- The sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium present in these papers does not exceed 100 parts per million by weight.

The same EU requirements on heavy metals are also listed in the US CONEG (Coalition of Northeastern Governors) requirements.

The analytical method is as follows: Microwave mineralization of the paper sample and analysis by atomic absorption spectrometry / hydride technique or by ICP-AES.

In the context of a dry contact, metals are not able to migrate from the packaging to the packed object.

**Source reduction – Minimization of Hazardous substances**

In particular, all Paper and Solid Board grades intended for packaging are so manufactured by [redacted] mills that the presence of noxious and other hazardous substances and materials as constituents of the packaging material or of any of the packaging components is minimized with regard to their presence in emissions, ash or leachate when packaging or residues from management operations or packaging waste are incinerated or landfilled (EN 13428).

Hazardous substances are identified as all substances classified as "Hazardous for the Environment" according to:

- Directive 67/548/CEE (Directive on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labeling of dangerous substances) and amendments,

- Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006

and characterized by the symbol "N" and the corresponding danger information (with the exception of lead, cadmium, mercury and hexavalent chromium and of their related compounds that are already taken into account in CR 13695-1).

The suppliers are asked a declaration of compliance indicating the position of their additives relatively to the classification as "N" preparation. If a preparation is classified "N", all actions are implemented by the mill in order to reduce the introduction of N substances in the process. Therefore, all Paper and Solid Board grades intended for packaging produced by Smurfit Kappa mills comply with this requirement.

### Recovery

All forms of recovery are key waste management options required by Directive 94/62/EC. Papers are recoverable by the three methods (recycling, energy recovery, and organic recovery) listed in the Directive to satisfy the Essential Requirements. Our statement concerning all Paper and Solid Board grades intended for packaging produced by [redacted] mills is the following:

- Recovery – Material recycling – (promoted as the preferred option):

All Paper and Solid Board grades intended for packaging that we supply you with is recoverable by material recycling, according to the requirements laid down in EN 13430.

- Recovery – Energy recovery:

The papers that we supply you with can be recovered in the form of energy. The content of organic matter is larger than 50% by weight of the product.

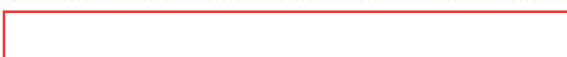
The energy recovery is that described in standard EN 13431, including specification of minimum inferior caloric value.

- Recovery – Biodegradability:

All Paper and Solid Board grades intended for packaging produced by [redacted] mills can be recovered through composting and biodegradation according to EN 13432.

### List of the [redacted] Paper and Solid Board mills

- SK Papier Recyclé France – Papeterie Alfa d'Avignon
- SK Ania Paper
- SK Baden Karton
- SK C.D. Haupt Papier - Wrexen
- SK Cellulose du Pin – Factice
- SK Herzberger Papierfabrik
- SK Hoya Papier
- SK Espana S.A. – Mengibar
- SK Czech s.r.o. – Morava
- SK Navarra – Sanguesa



- SK Nervion
- SK Nettingsdorfer
- SK Kraftliner Pitea
- SK Papier Recyclé France – Papeterie de Rethel
- SK Paper BV – Roermond
- SK Papier Recyclé France – Papeterie de Saillat
- SK SSK – Birmingham
- SK Townsend Hook
- SK Zülpich Papier

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