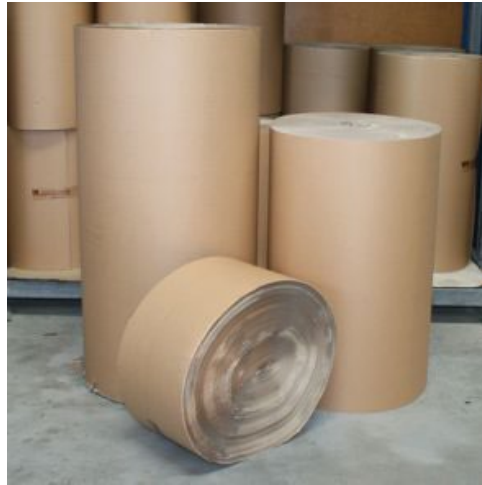




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## Corrugated Cardboard - North Island

### Use of Packaging Material for Food Contact Packaging

Oji Fibre Solutions (NZ) Limited (“OjiFS”) supplies corrugated paperboard packaging to a large number of customers to be used in New Zealand or for the export of many foods including produce, meat, fish and prepared foods.

Corrugated paperboard packaging is made from three main inputs – paper, adhesive and ink. While the adhesive and ink are generally in indirect contact with the contents of the packaging, the paper on the inside of a pack can be considered to, at times, be in direct contact with the contents of the packaging. Accordingly, OjiFS works with its suppliers to ensure its packaging complies with local and international direct and indirect food contact regulations. These regulations, and other information about our packaging, is set out below.

### Relevant regulations:

#### 1. USA

The most recognised regulation that covers the requirements of food packaging, either in direct or indirect food contact, is the USA Code of Federal Regulations Title 21 – Food and Drugs. The part of this regulation that is specifically relevant to the product supplied by OjiFS is:

- 21 CFR Part 176.170 Indirect Food Additives – Paper and Paperboard Components, Paragraph c, Conditions C and E.
- Condition C – product hot filled and pasteurised above 150°F.
- Condition E – product room temperature filled and stored.

According to the FDA requirements, Graphix, HiGold, Climate and EcoKraft is approved for use with direct contact with all food types under conditions of use C and E, as stated in 21CFR Part 176.170 and 176.180.

OjiFS confirms that the paper manufactured at Kinleith mill used to produce the packaging meets the requirements of these conditions.



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In addition, OjiFS also confirms the inks and adhesives comply with these additional USFDA regulations:

- a) Title 21 Part 109 –Unavoidable Contaminants in Food for Human Consumption.
- b) Title 21. Part 175 –Indirect food additives – adhesives and components of coatings.
- c) Title 21 Part 182.90 –Substances migrating to food from paper and paperboard components.

## 2. Other International Regulations

The following regulations are also quoted from time to time in relation to food contact packaging:

- a) EU Regulation (EC) 1935/2004 (repealing Directives 80/590/EEC and 89/109/EEC)
- b) Commission regulation (EC) No 2023/2006, on good manufacturing practices for materials and articles intended to come into contact with food.
- c) EU Registration, Evaluation and Authorisation of Chemicals System (REACH) Compliance. The REACH SHVC list was last updated 23rd January 2024.

OjiFS confirms that it complies with these regulations.

In addition, the inputs used in OjiFS's packaging material are manufactured in compliance with Directive 94/62/EC including subsequent amendments 2004/12/EC 2005/20/EC, EU/2018/852 and its implementation in the UK "The Packaging (Essential Requirements)" Regulation 2015 No 1640. Consequently, the combined total amount of Lead, Cadmium, Mercury and Hexavalent Chromium in OjiFS packaging should not exceed 100ppm.

## 3. NZ and Australia

The FSANZ Food Standards Code, dated 1 September 2022, applies to packaging. The relevant section is schedule 19, 1.4.1. Contaminants and Natural Toxicants. This section specifically states that certain products (e.g. metals) are not allowed in nominated food.

It can be confirmed that none of the relevant contaminants and toxicants to food packaged in paperboard are knowingly added to any of the products used in the manufacture of corrugated paperboard packaging.

OjiFS confirms that its packaging material complies with the New Zealand Food Standards Code 1.1.1-10 (11) which sets out that any packaging, and any article or material in the packaging or in contact with the food, must not, if taken into the mouth: (a) be capable of being swallowed or obstructing any alimentary or respiratory passage; or (b) be otherwise likely to cause bodily harm, distress or discomfort.



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## OTHER MATTERS:

Allergens:	<p>Corrugating adhesives, used to bond the linerboard and fluted medium together, are made from food grade starch. This can be sourced from wheat, maize or tapioca. These starches do contain allergens.</p> <p>The starch is applied to the fluted medium and is not intended to come in direct contact with the contents of the pack as there is a linerboard between the starch adhesive line and the pack contents.</p>
Conditions of Use:	<p>For paper supplied by OjiFS's Kinleith Mill the applicable conditions of use are -40°C to +80°C.</p>
Supplier Certification Status:	<p>All OjiFS corrugated packaging manufacturing sites are ISO 9001 certified and operate Food Safety Management Systems that comply with ISO22000. These sites are in Auckland, Levin and Christchurch. All sites also have very strict in-house health and safety rules and HACCP guidelines.</p>
Identification:	<p>All packs supplied to customers will have the identification either on the base or, in the case of a case lid, on a flap that will be hidden when the pack is made up. This identification will include any or all of the following:</p> <ul style="list-style-type: none"><li>• A unique pack identifier number with a PM prefix.</li><li>• A production date code.</li></ul>
Validity:	<p>This letter is valid for all packaging supplied by OjiFS for a period of 12 months from 26th July 2023. Where any changes to either the composition of our packaging or our manufacturing process require modifications to be made to this letter, we will do our best to notify you in writing prior to any new product being supplied.</p> <p>The information in this letter has been provided to the best of OjiFS's knowledge and contains some information supplied by third parties. Accordingly, no warranty or guarantee as to its accuracy is given by OjiFS, nor is any liability accepted by OjiFS.</p>



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