

Allée des Fougères – Factice
33380 Biganos
Fax : +33 (0) 5 57 70 87 15
E-mail : pascal.baumard@smurfit kappa.com

AC/SAF&ENV 329 07001

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DECLARATION OF COMPLIANCE
ACCORDING TO THE ESSENTIAL REQUIREMENTS OF DIRECTIVE 94/62/EC:
SOURCE REDUCTION - HEAVY METALS –
MINIMIZATION OF HAZARDOUS SUBSTANCES - RECOVERY

Company : **Smurfit Kappa**

Product : **All packagings produced by Smurfit Kappa plants**

We hereby state that **all packagings** produced by **Smurfit Kappa plants** comply with the "Essential requirements" of Directive 94/62/EC on Packaging and Packaging Waste amended by Directive 2004/12/EC.

Source reduction – Heavy metals:

We hereby state that **all packagings** produced by **Smurfit Kappa plants** 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:

- 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 analyses results are presented in test report RE/ANA&ENV 223 05006 Co on 24-11-2005.

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

Source reduction – Minimization of Hazardous substances:

In particular, our packaging are so manufactured 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.

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 labelling of dangerous substances) and amendments, 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 plants in order to reduce the introduction of N substances in the process. Therefore, **all packagings** produced by **Smurfit Kappa plants** comply with this requirement.

Recovery:

All forms of recovery are key waste management options required by Directive 94/62/EC. Packaging must be recoverable by at least one of three methods (recycling, energy recovery, and/or organic recovery) to satisfy the Essential Requirements. Our statement concerning packagings produced by SK plants is the following:

Recovery – Material recycling:

The materials that we supply you with are recoverable by material recycling, according to the requirements laid down in EN 13430.

Recovery – Energy recovery:

The materials that we supply you with can be recovered in the form of energy. Their 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:

Our packaging can be recovered through composting and biodegradation according to EN 13432.

This certificate of conformity has a validity of 2 years from its issuing date. It consists of 2 pages.



Sylviane Armagnacq
Product Safety – Environmental Affairs