

Certificate of FDA Compliance

2012 Statement of Product Compliance

FDA Letter of Guarantee:

- Unbleached Kraft paper and containerboard products (including paperboard made from pulp derived from reclaimed fiber) produced by
- The Companies at their facilities comply with the Federal Food, Drug and Cosmetic Act Title 9 for paper contacting meat and poultry food
- Products at temperatures below 150 degrees Fahrenheit, and under FDA Department of Health and Human Services regulations, Title 21
- CFR Sections 176.170 and 176.180, as applicable to indirect food additives and for components of paper in contact with aqueous and fatty foods as well as dry foods.
- Petroleum wax (paraffin wax) and clear coatings also comply for contacting food products, including aqueous and fatty foods, per the above regulations.
- Adhesives (glues), including double-sided adhesive tape, comply for indirect contact with food items only, per 21 CFR Section 175, especially 175.105 and 175.106.
- Inks may be used on packages containing food items when the ink is on the outside of the packaging, i.e. not in direct contact, per 21 CFR Section 175. (Please contact your Company representative for special, inside ink applications that are permitted to come into contact with food items.)

ECF Bleaching: Bleached paperboard used by the Companies is produced using an elemental chlorine free ("ECF") bleaching process.

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Including Title 27, California Code of Regulations Sections 25705 and 25713):

The Companies' products made from Kraft containerboard are not considered a significant risk under these regulations.

Canadian Food Inspection Agency: The Companies hold a current letter of non-objection from the Canadian Food Inspection Agency. A copy of this letter is available upon request.

State of California Reductions of Toxics in Packaging/Coalition of Northeastern Governors (CONEG): The Companies certify that all packaging and packaging components comply with the requirements of the toxics in packaging laws. Specifically, (1) We certify that the regulated metals lead, cadmium, mercury, or hexavalent chromium were not intentionally added to any packaging or packaging component during the manufacturing process; (2) We further certify that the sum of incidental trace quantities of lead, cadmium, mercury, or hexavalent chromium in any packaging or packaging component does not exceed 100 parts per million by weight; (3) Companies will maintain adequate documentation of this certification for inspection upon request.

RoHS Certification: This is to certify that the Companies' corrugated products do not contain, at the date of shipment or delivery, any hazardous substances as described in the RoHS Directive, to include: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), or polybrominated diphenyl ether (PBDE). Should incidental levels of the above mentioned materials be present, these levels conform to the allowable limits as described in the Directive; <1000 ppm (except for Cadmium, which is limited to <0.01% or <100 ppm).

FDA/Latex Certification: The Companies' paper and containerboard products are not manufactured using nor, to the best of our knowledge do they contain, natural rubber or natural latex compounds as defined in 21 CFR 801.437.

Ozone Depleting Substances: The Companies assure their customers that none of the class 1 or class 2 ozone depleting chemicals listed in sections 602(a) and 602(b) of the 1990 Clean Air Act are contained in or come in contact with any of our products.

FDA Allergen Review: The Companies do not knowingly add the following ingredients to its products as major components but the use or presence of these ingredients are neither tracked nor tested: peanuts, tree nuts, sesame seeds, dairy products, eggs, fish, shellfish, soy products, wheat, gluten or tartrazine. The following ingredients are known to exist in our products although the levels present are unknown and not tested: sulfites (from the Kraft pulping process), and corn products (from corn starch addition to paper).

FSC/SFI Certification: Since the Companies own no forest land they hold neither FSC nor SFI certification. However, we have agreed to adhere to a set of forestry principles outlined in the Sustainable Forest Initiative (SFI) of the American Forest & Paper Association (AFPA). The SFI is similar to the FSC but is more common among American pulp and paper manufacturers. The principles of SFI call for a land stewardship ethic, which integrates the reforestation, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water resources, wildlife and fish habitat, and forest aesthetic values.

Organic Food Packaging: The Companies do not intentionally add synthetic fungicides, preservatives or fumigants to their packaging products. Sheets Unlimited does add biocides during the starch-based adhesive preparation process, so as to prevent biodegradation prior to use of the starch-based adhesive in the manufacture of corrugated sheets. The biocides are suitable for use in direct food contact packaging, are added to the raw material at very low levels, and have no functional purpose in the finished packaging product or food packaged in the finished product.

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