

DECLARATION OF COMPLIANCE

26/01/2024

CUSTOMER: To whom it may concern

We hereby confirm that the products we supply do meet the requirements put forward in the legal framework presented below.

Laboratory: Wessling GmbH, Eurofins CPT

1. DESCRIPTION OF MATERIALS AND ARTICLES

Green PE coated paper hot cups

Bleached virgin-fibre board with a three layer fibre construction and with CTMP (chemi-thermomechanical pulp) in the middle layer and coated with 11 to 15 g/m² of Green PE inside.

SP4G(L)

SP7HG(L)

SP8G(L)

SP9SG(L)

SP10G(L)

SP12G(L)

SP14G(L)

SP16G(L)

SP22G(L)

PG ID: FIUT-BAVHAV

ID: FIUT-BAVHAV5

2. INTENDED USES

Products are intended for hot beverage

Products listed above can be in contact with following food stuff:

Aqueous

Acidic

Dairy

Dry

Alcohol <6%

In following conditions of temperature and time*:

Frozen - refrigerated (for)

Lukewarm (Up to 40°C for Up to 24 hours)

Hot-fill (Up to 100°C for Up to 15 min)

High temperature application (Up to 70°C for Up to 2 hours)

* It is the obligation of the recipient of this declaration to ensure that the packaging is suitable for the aimed processing and downstream use circumstances.

3. LEGISLATION

We confirm that the products listed in section 1 fulfill the requirements on products intended for use in contact with food as defined in:

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food and its amendments up to date of this statement
- Federal Institute for Risk Assessment BfR XXXVI, Paper and Board for food contact
- GB 31603-2015 (China) National Food safety standard on good manufacturing practice for food contact materials and articles
- GB 4806.1-2016 (China) National Food Safety Standard-General requirements for safety of materials and articles used in food-contact
- GB 4806.6-2016 (China) National Food Safety Standard-Plastic Resin used in Food-contact
- GB 4806.7-2016 (China) National Food Safety Standard - Food Contact Plastic Materials and Articles
- GB 4806.8-2016 (China) National Food Safety Standard-Food Contact Paper and Board Materials and Articles
- GB 9685-2016 (China) Hygienic standards for uses of additives in food containers and packaging materials
- Regulation (EC) No 10/2011 on plastic materials and articles intended to come into contact with food and its amendments up to date of this document
- Swiss Ordinance SR 817.023.21 for Packaging Inks
- The Italian Ministerial Decree of 21st March 1973 and its amendments up to date of this statement
- The Italian Presidential Decree No. 777 of 23rd August 1982 and its amendments up to date of this statement
- The U.S. Federal Food, Drug and Cosmetic Act including Code of Federal Regulations (CFR) Title 21 where applicable

4. ADDITIONAL LEGISLATION

We confirm that the products listed in section 1 fulfill the requirements on products intended for use in contact with food as defined in:

- Directive 94/62/EC on packaging and packaging waste and its amendments up to date regarding the threshold limit of 100 ppm by weight of heavy metals
- EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles
- French Loi n° 2010-729 du 30 Juin 2010 modifiée par la loi n° 2012-1442 du 24 décembre 2012 aiming at the suspension of the manufacture, the import, the export and the placing on the market of any food packaging containing bisphenol A
- Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH); based on the information from our suppliers, we can confirm that the product does not contain substances included on the list of Substances of Very High Concerning (SVHC) in concentration above 0.1 % (w/w)

5. MIGRATION

According to Regulation (EC) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per 1 dm² of surface area of the packaging or 60 mg per 1 kg of foodstuff or food simulant (limiting value of the overall migration). The ratio of food contact surface area to volume used to establish the compliance of the article/s were **1,9 dm² / 200 ml**.

5.1. OVERALL MIGRATION

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE	FOLLOWED BY TIME	FOLLOWED BY TEMP
Acetic acid 4 %	2 hours	70°C		
Ethanol 50 %	2 hours	70°C		
Vegetable oil (i.e. 2 hours Olive oil)		70°C		

5.2. SPECIFIC MIGRATION

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE	FOLLOWED BY TIME	FOLLOWED BY TEMP
Acetic acid 3 %	2 hours	70°C		
Ethanol 95 %	2 hours	70°C		

Substances with restriction

The products listed above may contain following substance/s with restriction/s:

CAS: 0000128-37-0

PMREF Number: 46640

Substance: 2,6-di-tert-butyl-p-cresol

Restriction (mg/kg): 3

For confidentiality reasons, all such substances are not identified here. However, specific migration of these substances have been tested in conditions corresponding to intended use and migration level has been proven to be under a specific limit set to each substance.

6. DUAL USE SUBSTANCES

The products listed above may contain following dual use substances:

CAS: 65996-62-5

E Number: E1404

Substance: Starch

Restriction: unknown

PM Ref. No.: unknown

CAS: 57-55-6

E Number: E15200

Substance: Propylene glycol

Restriction: unknown

PM Ref. No.: unknown

CAS: 25322-68-3

E Number: E1521

Substance: Polyethylene glycol

Restriction: unknown

PM Ref. No.: unknown

CAS: 64-18-6

E Number: E236

Substance: Formic acid

Restriction: unknown

PM Ref. No.: unknown

CAS: 7631-99-4

E Number: E251

Substance: Sodium nitrate

Restriction: unknown

PM Ref. No.: unknown

CAS: 128-37-0

E Number: E321

Substance: 2,6-Di-terc-butil-p-cresol (BHT)

Restriction: unknown

PM Ref. No.: unknown

CAS: 77-92-9

E Number: E330

Substance: Citric acid

Restriction: unknown

PM Ref. No.: unknown

CAS: 124-04-9

E Number: E355

Substance: Adipic acid

Restriction: unknown

PM Ref. No.: unknown

CAS: 1338-39-2

E Number: E493

Substance: Sorbitan monolaurate

Restriction: unknown

PM Ref. No.: unknown

CAS: 7786-30-3

E Number: E511

Substance: Magnesium chloride

Restriction: unknown

PM Ref. No.: unknown

CAS: 7664-93-9

E Number: E513

Substance: Sulphuric acid

Restriction: unknown

PM Ref. No.: unknown

CAS: 7757-82-6

E Number: E514

Substance: Sodium sulphate

Restriction: unknown

PM Ref. No.: unknown

CAS: 7783-20-2

E Number: E517

Substance: Ammonium sulphate

Restriction: unknown

PM Ref. No.: unknown

CAS: 10043-01-3

E Number: E520

Substance: Aluminium sulphate

Restriction: unknown

PM Ref. No.: unknown

CAS: 1310-73-2

E Number: E524

Substance: Sodium hydroxide

Restriction: unknown

PM Ref. No.: unknown

CAS: 7631-86-9

E Number: E551

Substance: Silicone dioxide

Restriction: unknown

PM Ref. No.: unknown

CAS: 8061-51-6

E Number: E565

Substance: Sodium lignosulfonate

Restriction: unknown

PM Ref. No.: unknown

CAS: 57-11-4

E Number: E570

Substance: Stearic acid

Restriction: unknown

PM Ref. No.: unknown

CAS: 63148-62-9

E Number: E900

Substance: Dimethyl silicones and siloxanes

Restriction: unknown

PM Ref. No.: unknown

7. OTHER SUBSTANCES

- Bisphenol A (BPA) - Huhtamaki does not intentionally use or add Bisphenol A to its products.
- Fluorinated substances - Huhtamaki does not intentionally use any Fluorine containing active compounds, such as PFOA and PFOS, that might be used as fat and water repellent on the surface of paper and paperboard articles. This information is based on the information provided by our raw material suppliers, and we do not routinely test our products against the Fluorine containing substances or compounds.
- Non-intentionally added substances (NIAS) Under the legislation, overall migration limits of permitted substances are 60 mg/kg and unauthorized substances may be present in food contact materials, provided they do not migrate at levels above 0.01 mg of substance per kg of food. However, there is no common agreed test or methodology for NIAS evaluation. We have worked with our raw material suppliers to identify potential non evaluated substances (NES) that might be present in our products as NIAS. We have had products analyzed at an accredited laboratory for the presence of NIAS and NES. The testing has been conducted under foreseeable conditions of use, and it has been confirmed that the overall migration limit of 60 mg/kg of food was not exceeded by substances permitted under the applicable regulations. If present, NIAS and NES migrating, in amounts of more than the limiting value of 0.01 mg/kg, go through a risk assessment to confirm that the migratory of the substances in the foodstuff has an exposure below the limits and there is a low probability for adverse health effects.

8. TRACEABILITY

Traceability is achieved by reference to coding on the item and/ or case label and/or order number.

This certificate is valid for two years from the date it has been issued, or until there is substantial changes in the composition or production that bring about changes in the migration from the materials or articles or when new scientific data becomes available.

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