

## DECLARATION OF COMPLIANCE

16/12/2020

**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

### **1. DESCRIPTION OF MATERIALS AND ARTICLES**

**PE coated cold drink cups**

DP12G

DP16G

DP22G

PG ID: FIUT-BWCJN6

ID: FIUT-BWCJN60

## 2. INTENDED USES

Products are intended for cold 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 Up to 2 hours)

Lukewarm (Up to 40°C for Up to 2 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
- 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

## 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
- 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 dm<sup>2</sup> 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 **2,0 dm<sup>2</sup> : 250 ml**.

### 5.1. OVERALL MIGRATION

Following migration tests were conducted:

| SIMULANT        | TIME    | TEMPERATURE | FOLLOWED BY<br>TIME | FOLLOWED BY<br>TEMP |
|-----------------|---------|-------------|---------------------|---------------------|
| Acetic acid 3 % | 2 hours | 70°C        |                     |                     |
| Ethanol 50 %    | 2 hours | 70°C        |                     |                     |

### 5.2. SPECIFIC MIGRATION

Following migration tests were conducted:

| SIMULANT        | TIME    | TEMPERATURE | FOLLOWED BY<br>TIME | FOLLOWED BY<br>TEMP |
|-----------------|---------|-------------|---------------------|---------------------|
| Acetic acid 3 % | 2 hours | 70°C        |                     |                     |
| Ethanol 50 %    | 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, exact names of all such substances are not identified here. However, specific migrations of these substances have been tested in conditions corresponding to intended use and migration level has been proved to be under a specific limit set to each substance.

## 6. DUAL USE SUBSTANCES

As per statements we have received from our suppliers, none of the raw materials contain dual use substances.

## 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.

# Huhtamaki

Huhtamaki Foodservice Nordic Oy

Polarpakintie 4

13300 Hämeenlinna

FINLAND

Puh: +358 - (0)10 686 7000

Fax: +358 - (0)10 686 7552