

## DECLARATION OF COMPLIANCE

17/03/2023

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

### 1. DESCRIPTION OF MATERIALS AND ARTICLES

#### PAPER LIDS FTG WITH PE GREEN COATING, PRINTED / UNPRINTED

LIDS 12OZ FTG,

LIDS 16OZ FTG,

LIDS 21/26OZ FTG

Paper lids are made of bleached cardboard with PE Green coating from plant-based sources (inner side of the lid), the outer layer may be printed.

### 2. INTENDED USES

Lids are intended to be used together with paper FTG containers to cover and to avoid spillages of beverages packed in the containers. The lid may temporarily come in direct contact with foodstuff, however the lid is not intended to hold the foodstuff for longer periods of time.

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

Aqueous

Acidic

Dairy

Alcohol < 6%

In following conditions of temperature and time\*:

Cooling conditions storage up to 24h

Room temperature storage or below up to 24h

Hot-fill (Up to 70°C for up to 2 hours including 15 min up to 100°C)

*\* 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

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NIP: 643-174 -19-74, REGON: 241-281-392, KRS: 0000334493, BDO: 000015828

- 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
- 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
- Federal Institute for Risk Assessment BfR XXXVI, Paper and Board for food contact
- The U.S. Federal Food, Drug and Cosmetic Act including Code of Federal Regulations (CFR) Title 21 § 176.170
- GB 4806.8-2016 (China)
- 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

Inks used for printing conforms:

- EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles;
- Swiss Ordinance 817.023.21 on printing inks.

#### 4. MIGRATION

According to Regulation (EU) 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 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 1,3 dm<sup>2</sup>/65 ml.

#### OVERALL MIGRATION

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE
Acetic acid 4 %	2 hours	70°C
Ethanol 50 %	2 hours	70°C

#### Substances with restriction tested

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

Substance	CAS Number	FCM
1-octene	111-66-0	264
Petroleum hydrocarbon resins (hydrogenated)	-	97
Waxes	-	94

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2,6-di-tert-butyl-p-cresol	128-37-0	315
Acetic acid, vinyl ester	108-05-4	231
Formaldehyde		98
Acetaldehyde		128
N-alkyl(C10-C13) benzenesulphonic acid	-	14
Acetic acid methyl ester	79-20-9	-
Cu		
5-chloro-2methyl-4-isothiazol-3-one and 2-methyl-4-isothiazol-3-one	26172-55-4	-
2-bromo-2-nitropropane-1,3-diol	52-51-7	-

## DUAL USE SUBSTANCES

The products listed above may contain following Dual Use Substances:

Substance	E Number
2,6-di-tert-butyl-p-cresol	E321
Acetic acid	E260
Sodium acetate	E262
Sodium hexametaphosphate	E452i
Koalin	E559

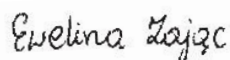
## 5. OTHER SUBSTANCES

- 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.

## 6. TRACEABILITY

This can be done by referring to traceability by Licence Plate Number, Box Label, Order number. This certificate is valid 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.



*Ewelina Zajac*

**Quality and Compliance Specialist**