Huhtamaki

DECLARATION OF COMPLIANCE 11/01/2022

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

Biocoated hot drink cups

Bleached virgin-fibre board with a three layer fibre construction and with CTMP (chemi-thermomechanical pulp) in the middle layer and coated with PLA inside.

SBIO4
SBIO7H
SBIO8
SBIO9S
SBIO12
SBIO16

PG ID: FIHU-9EHPMF
ID: FIHU-9EHPMF0

2. INTENDED USES

Products are intended forDry and warm storage. Don't use strongly scented products in the same place.

Products listed above can be in contact with following food stuff:
Aqueous
Acidic
Dairy
Dry
Alcohol <6%

In following conditions of temperature and time*:
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
- 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

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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:

- CEN EN 13432 Requirements for packaging recoverable through composting and biodegradation
- 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^2 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 **2,1:250**dm^2/ml.

5.1. OVERALL MIGRATION

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE	FOLLOWED BY TIME	FOLLOWED BY 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 TIME	FOLLOWED BY TEMP
Ethanol 20%	2 hours	70°C		

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Substances with restriction

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

CAS: 822-06-0
PMREF Number: 18640
Substance: Hexamethylene diisocyanate
Restriction (mg/kg): 1 mg/kg

CAS: 110-63-4
PMREF Number: 13720
Substance: 1,4-Butanediol
Restriction (mg/kg): 5 mg/kg

CAS: 100-21-0
PMREF Number: 24910
Substance: Tereptalic acid
Restriction (mg/kg): 7,5 mg/kg

CAS: 109-99-9
PMREF Number: 25150
Substance: Tetrahydofuran
Restriction (mg/kg): 0,6 mg/kg

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

The products listed above may contain following dual use substances:

CAS: 50-21-5

E Number: E270

Substance: Lactic acid

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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