Huhtamaki

CONFIDENTIAL

DECLARATION of COMPLIANCE – 03.01.2025

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

1. DESCRIPTION OF MATERIALS AND ARTICLES

Kraft Rectangle

30204184	PAPER RECTANGULAR CONTAINER 750ML KRAFT, PP COATING (FSC)
30204185	PAPER RECTANGULAR CONTAINER 1000ML KRAFT, PP COATING (FSC)
30206645	PAPER RECTANGULAR CONTAINER 500ML FSC KRAFT, PP COATING

Products are made of paperboard with PP coated lamination.

The paperboard and PP coating are virgin.

Substance Name	CAS Number	E Number
Polypropylene	9003-07-0	925-345-2

2. INTENDED USES

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

All beverages and all food types

In following conditions of temperature and time*:

Fill (Up to 40^{0}C for up to 30 min) (Up to 70^{0}C for up to 2 hours)
Microwave use with long term heating 800watt for 12 minutes

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

Recommended service temperature (-)0 degC- (+)70 degC.

The product meets the above requirements and poses no threat to human health provided that use it as intended.

3. LEGISLATION

We certify that these products fulfil the requirements on products intended for use in contact with food and packaging waste as described in:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (07.08.2009) and its amendments up to date of this document

- Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food (17.04.2008) 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 (29.08.2019) and its amendments up to date of this document
- Regulation (EU) 2016/1416 of 24 August 2016 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food
- Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food
- Commission Regulation (EU) 2017/752 of 28 April 2017 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food
- EuPIA Guideline on printing inks applied to non-food contact surface of food packaging materials and articles,
- Commission Regulation (EC) No 282/2008 of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods and amending Regulation (EC) No 2023/2006.
- Commission Regulation (EU) 2023/1442 of 11 July 2023 amending Annex I to Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, as regards changes to substance authorisations and addition of new substances
- Commıssıon Regulatıon (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles
- Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers.(Annex II)
- Federal Institute for Risk Assessment BfR XXXVI, Paper and Board for food contact.
- Turkish Food Codex Food Labeling and Consumer Information Regulation (O.N. 29960/26.01.2017) and its amendments up to date of this statement
- Property of Materials and Food Contact Regulation on Good Manufacturing Practice and Registration Procedures (O.N. 28373/03.08.2012)- (O.N: 28547/02.02.2013) and its amendments up to date of this statement
- Veterinary Services, Plant Health, Food and Feed Law (O.N. 27610/13.06.2010) - (O.N: 30616/5.12.2018) and its amendments up to date of this statement
- Regulation on Food Hygiene (O.N. 28145/17.12.2011) and its amendments up to date of this statement
- Regulation on plastic materials and articles intended to come into contact with food (2019/44) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Regulation on the list of simulants used in migration test of plastic materials and articles intended to come into contact with food (2019/43) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Turkish Food Codex Regulation on Substances and Materials in contact with food (R.G. 30680 / 8.2.2019) and its amendments up to date of this statement
- Regulation on Registration and Approval Procedures of Food Businesses (R.G. 30825 / 08.07.2019) and its amendments up to date of this statement
- The Regulation of Waste Control of Food Contact Materials
- Turkısh Food Codex Plastıc Materıals In Contact Wıth Food And Amendment To Materıals Notıfıcatıon (Notıfıcatıon No: 2019/44) Notıfıcatıon On The Implementatıon Of (2023/33) (O.N. 32538/06.05.2024)

4. ANALYSES

According to Turkish Food Codex and Regulation (EU) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per dm^2 (60 mg/kg) foodstuff or food simulant (limiting value of overall migration) and specific migration limits shown below as mg/kg.

Following migration tests were conducted:

DETERMINATION of OVERALL MIGRATION						
FOOD TYPE	**SIMULANT**	**TIME (h)**	**TEMP. (C^0)**	**METHOD**	**LOQ* (mg/kg)**	**REQUIREMENT**
Acidic Food	Food Simulant B, Acetic Acid 3%	2	70	EN 1186-1, EN 1186-3	20	<=60 mg/kg
Aqueous Food	Food Simulant A, Ethanol 10%	2	70	EN 1186-1, EN 1186-3	20	<=60 mg/kg
Alternative Simulant for fatty Food Simulant	Fatty Food Simulant, Ethanol 95%	2	60	EN 1186-1, EN 1186-3	20	<=60 mg/kg
Fatty Food Subsituted Simulation	Isooctane	30 min.	40	EN 1186-1, EN 1186-3	20	<=60 mg/kg

* LOQ: Limit of Quantification

DETERMINATION of SPECIFIC MIGRATION							
SUBSTANCE	**CAS Number**	**SIMULANT**	**TIME (h)**	**TEMP. (C^0)**	**SML REQUIREMENT (mg/kg)**	**METHOD**	**DETECTION LIMIT (mg/kg)**
Manganase (Mn)	7439-96-5	Acetic acid 3%	2h	70	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Copper (Cu)	7440-50-8	Acetic acid 3%	2h	70	5 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Cobalt (Co)	7440-48-4	Acetic acid 3%	2h	70	0.05 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Lithium (Li)	7439-93-2	Acetic acid 3%	2h	70	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Zinc (Zn)	7440-66-6	Acetic acid 3%	2h	70	5 (max.)	EN 13130-1 ISO 17294-1&2	0.010
Barium (Ba)	7440-39-3	Acetic acid 3%	2h	70	1 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Iron (Fe)	7439-89-6	Acetic acid 3%	2h	70	48 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Aluminum (Al)	7429-90-5	Acetic acid 3%	2h	70	1 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Nickel (Ni)	7440-02-0	Acetic acid 3%	2h	70	0.02 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Antimony (Sb)	7440-36-0	Acetic acid 3%	2h	70	0.04 (max.)	EN 13130-1 ISO 17294-1&2	0.005
Arsenic (As)	7440-38-2	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.002
Cadmium (Cd)	7440-43-9	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Lead (Pb)	7439-92-1	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01

Mercury (Hg)	7439-97-6	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Europium (Eu)	7440-53-1	Acetic acid 3%	2h	70	0.05 sum (max.)	EN 13130-1 ISO 17294-1&2	0.005
Gadolinium (Gd)	7440-54-2	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Lanthanum (La)	7439-91-0	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Terbium (Tb)	7440-27-9	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Chromium (Cr)**#**	7440-47-3	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Calcium (Ca)	7440-70-2	Acetic acid 3%	2h	70	-	EN 13130-1 ISO 17294-1&2	0.1
Potassium (K)	7440-09-7	Acetic acid 3%	2h	70	-	EN 13130-1 ISO 17294-1&2	0.1
Magnesium (Mg)	7439-95-4	Acetic acid 3%	2h	70	-	EN 13130-1 ISO 17294-1&2	0.1
Sodium (Na)	7440-23-5	Acetic acid 3%	2h	70	-	EN 13130-1 ISO 17294-1&2	0.1

ND = Not detected

= When migration of total chromium is between 0.01 mg/kg and 3.6 mg/kg, chromium (VI) content in plastic shall be not detected.

ANALYSIS NAME	CAS Number	TIME (h)	TEMP. (°C)	METHOD	LOQ*	REQUIREMENT
Determination of Bisphenol A Migration, Aqueous Food Simulant	80-05-7 FCM No: 151	2h	70	~~BS EN 14372~~ EN CEN/TS 13130-13 14350-2	0.01 mg/kg	<=0,05 mg/kg
Butyl Benzyl Phthalate **(BBP)** Phthalatec Acid Benzyl butyl ester	85-68-7 FCM No: 159	-	-	BS EN 14372	0.002 %	<=0,1 %
Di-n-Butyl Phthalate **(DBP)**	84-74-2 FCM No: 157	-	-	BS EN 14372	0.002 %	<=0,05 %
Di(Ethylhexyl) Phthalate **(DEHP)**	117-81-7 FCM No: 283	-	-	BS EN 14372	0.001 %	<=0,1 %
Di-Iso-Nonyl Phthalate**(DINP)**	28553-12-0 FCM No: 728	-	-	BS EN 14372	0.022 %	<=0,1 %
Di-Isodecyl Phthalate **(DIDP)**	26761-40-0 FCM No: 729	-	-	BS EN 14372	0.015 %	<=0,1 %

* LOQ: Limit of Quantification

SPECIFIC MIGRATION of PRIMARY AROMATIC AMINES (PAA)							
COMPOUND	**CAS Number**	**SIMULANT**	**TIME (h)**	**TEMP. (°C)**	**METHOD**	**DETECTION LIMIT(mg/ kg)**	**REQUIREMENT**
4-Aminodiphenyl	92-67-1	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
Benzidine	92-87-5	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
4-Chloro-o-toluidine	95-69-2	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
2-Naphthylamine	91-59-8	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
o-Aminoazotoluene	97-56-3	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
2-Amino-4-nitrotoluene	99-55-8	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
p-Chloroaniline	106-47-8	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
2,4-Diaminoanisole	615-05-4	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
4,4'-Diaminodiphenylmethane	101-77-9	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
3,3'-Dichlorobenzidine	91-94-1	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
3,3'-Dimethoxybenzidine	119-90-4	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
3,3'-Dimethylbenzidine	119-93-7	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
3,3'-Dimethyl-4,4'-diamino diphenylmethane	838-88-0	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
p-Cresidine	120-71-8	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
4,4'-Methylene-bis (2-chloroaniline)	101-14-4	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
4,4'-Oxydianiline	101-80-4	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
4,4'-Thiodianiline	139-65-1	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
o-Toluidine	95-53-4	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
2,4-Toluylenediamine	95-80-7	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
2,4,5-Trimethylaniline	137-17-7	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
o-Anisidine	90-04-0	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND

4-Aminoazobenzene	60-09-3	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
m-Phenylendiamine	108-45-2	Acetic acid 3%	2h	70	EN24815 EN2011	0.002	ND
Benzoguanamin	91-76-9	Acetic acid 3%	2h	70	EN24815 EN2011	0.05	5
4,4'-Methylenebis(3-chloro- 2,6-diethylaniline	106246-33-7	Acetic acid 3%	2h	70	EN24815 EN2011	0.05	0.05
Total of other primary aromatic amines	-	Acetic acid 3%	2h	70	EN24815 EN2011	0.010	0.010

Analysis Name: Specific migration of Primary Aromatic Amines **(PAA)**
Requirement: European Commission Regulation No. 10/2011 Annex II, Regulation No. 2016/1416, Regulation No. 2020/1245 and Regulation No. 1935/2004 –Specific Migration of Primary Aromatic Amines

Remark: **ND =** Not detected

SENSORY ANALYSIS		
ANALYSIS NAME	**METHOD**	**REQUIREMENT**
Sensory Analysis	DIN 10955	<= 2

No substances with a specific migration limit are used.
The calculations are based on the assumption that 1 kg of food comes into contact with 6 dm2 of the packaging material.
Heavy metals: lead, cadmium, mercury and chromium is below the legal limit.
The limit value of 100 mg/kg is not exceeded.

5.OTHER ABSENT SUBSTANCES

Furthermore, we confirm that this compound is manufactured without the intentional use of the following substances:

OTHER ABSENT SUBSTANCES	**CAS NO**
2,2'-Dimethoxy-2-phenylacetophenone	24650-42-8
2,4-Pentadione (synonyme acetylacetone)	123-54-6
Acrylamide	79-06-1
Antimony trioxide	1309-64-4
Adipates	141-04-8
Adsorbable organically combined halogens (AOX)	106-48-9
Aromatic hydrocarbons (MOAH, "mineral oil aromatic hydrocarbons")	63231-51
Azo dyes	90-04-0
Benzophenone and 4-methylbenzophenone and their derivatives	119-61-9 / 134-84-9
Bisphenol A and its derivatives e.g. Bisphenol A diglycidyl ether (BADGE)	80-05-7
Bisphenol F and its derivatives e.g. Bisphenol F diglycidyl ether (BFDGE)	620-92-8

Bisphenol S and its derivatives	80-09-1
Brominated fire retardants	58965-66-5
Chain- and ring-shaped hydrocarbons (MOSH, "mineral oil saturated hydrocarbons")	Mineralöle MOSH/MOAH
Cobalt(II)-chloride (CAS 7646-79-9 (anhydrous))	7646-79-9 16544-92-6(dihydrate) 7791-13-1(hexahydrate)
Cyanuric acid (1,3,5-triazin-2,4,6-triol)	108-80-5 6202-04-6 (Dihydrate)
Dimethylfumarate (DMF)	624-49-7
Diphenyl-2-ethylhexylphosphate (DPO)	1241-94-7
Ethyl-4-dimethylaminobenzoate	10287-53-3
Elastomers or rubber from which n-nitrosamines may be released N-Nitroso-di-benzylamine(NDBzA) N-nitrosodibutilamin(NDBA) N-nitrosodiethanolamine(NDELA) N-Nitrosodiethylamine (NDEA) N-Nitrosodiisobutylamine(NDiBA) 3,5,5-trimetil-N-nitroso-N- (3,5,5-trimetilheksil) -1-heksanamin(NDİNA) N-Nitrodiisopropylamine(NDİPA) N-Nitrosodimethylamine(NDMA) N-Nitrosodi-n-propylamine(NDPA) N-Nitrosomorpholine(NMOR) N-Nitrosoethylphenylamine(NEPhA) N-Nitroso-N-methylaniline(NMPhA) N-Nitrosopiperidine(NPIP) N-Nitrosodiethanolamine(NDELA)	 5336-53-8 924-16-3 1116-54-7 55-18-5 997-95-5 1207995-62-7 601-77-4 62-75-9 621-64-7 59-89-2 612-64-6 614-00-6 100-75-4 1116-54-7
Epoxidised soybean oil (ESBO)	8013-07-8
Formaldehyde	50-00-0
Halogens	CAS group number VIIA
Primary aromatic amines	80-08-0
Isopropylthioxanthone (ITX)	83846-86-0
Latex	9006-04-6
Maleicacid-di-(2-ethylhexyl)-ester	142-16-5
Melamine	108-78-1
Novolac glycidyl ether (NOGE)	158163-01-0
Nanoparticles and -materials (< 100 nm)	7440-22-4
Palm oil	8002-75-3
Propil Parabens	94-13-3
Perfluorinated organic compounds & fluorinated surfactants	-
Perfluorooctanoic acid (PFOA)	335-67-1
Semicarbazide (SEM)	563-41-7
Titan-acetylacetonate (TAA)	14024-64-7
Tributyltin (TBT)	688-73-3
Tributyltin oxide (TBTO)	56-35-9
Tris(4-nonyl-phenyl) phosphite (TNPP)	26523-78-4
Triclosan	3380-34-5
Vinylchlori	75-01-4

Phenols & Phenyphenole	108-95-2 / 90-43-7
Phthalates	CAS number cannot be referred as there are many different compounds
Polycyclic aromatic hydrocarbons (PAHs)	CAS number cannot be referred as there are many different compounds

6. DUAL USE ADDITIVES

Substances also authorised as direct **food additives** ("**Dual use additives**") are either not used for the manufacturing of this product, kind of not migrating, or only present in quantities that in case of their migration don't allow relevant contribution to exceed of the limits as set in the applicable food legislation.

7. TRACEABILITY

This can be done by referring to traceability by Box Label.

Box Label: Product Code, Product Description, Production Date

This certificate is valid until there is significant 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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