

Paper straws Declaration of Compliance

Hereby we confirm that our product:

Mixed Colored Paper spoon straws:

CODE	DESCRIPTION	ARTICLE No.	ADDRESSED TO
06.0055.07673513	PAPER SPOON STRAWS, FSC Mix, MIXED COLOURS, W/O BIOPAPER LABEL, 200X8X125 (28X125)	22-350	Frima Vafler A/S

Comply with 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 as well as with the requirements in BfR Recommendation XXXVI on paper and board articles intended to come into contact with food.

Comply with French regulations in force concerning materials and objects in contact with food, namely Decree No. 2007-766 of 10 May 2007, amended by Decrees No. 2008-1469 of 30 December 2008 - No. 2011-385 of 11 April 2011.

Comply with Fiche MCDA n°4 (V02 – 01/01/2019) - Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires as well as French law n° 2012-1442.

Comply with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles articles intended to come into contact with food.

The raw materials used comply with 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 as well as Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles articles intended to come into contact with food.

Paper straws raw materials	White and colored virgin paper grade (FSC certified) + water-based dispersion adhesive
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- Paper grade raw materials:

For the purpose to achieve high chemical and microbiological purity, only virgin high-quality FSC-certified paper used in the production of our products.

Moreover, the paper grade used is in compliance with the (Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code – LFGB) in the version of the



notification of 3 June 2013, (BGBl. P. 1426), last amendment by article 1 of the act of 30 June 2017 (BGBl. I p. 2147), §§ 30 and 31).

BfR Recommendation XXXVI

Complies with BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 91971) 83, last amended by 221st Announcement Bundesgesundheitsblatt 61 (2018) 236, as of September 2017).

Decreto Ministeriale 21 marzo 1973

Furthermore, the paper grade meets the analytical demands of the Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, last modification of 31 May 2016.

Decree no. 92-631 of 8 July 1992

Complies with the rules of the (Decree no. 92-631 of 8 July 1992 on materials and articles intended for contact with foodstuffs, products and drinks for men's or animals' food, state of 20 January 1994),

Fiche MCDA n°4 (V02 – 01/01/2019)

Complies with Fiche MCDA n°4 (V02 – 01/01/2019) - Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires, 4 Limites d'acceptabilité, Tableau 2.

Decree no. 2007-766 of 10 May 2007

Complies with (Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011-385 of 14 April 2011, supersedes Decree no. 92-631 of 8 July 1992 on materials and articles intended for contact with foodstuffs, products and drinks for men's or animals' food).

Netherland's Warenwet

Complies with Netherland's Warenwet of 14.03.2014 for food contact materials.

(EU) 528/2012

Complies with European Biocides-Regulation (EU) No 528/2012.

FDA (USA)

Furthermore, the paper grade is in compliance with the demands of the Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2018 edition), §§ 176.170 and 176.180.



- Water based dispersion adhesive:

(EU) No 10/2011

The adhesive used complies with (EU) No 10/2011 on plastic materials and articles intended to come into contact with food and its last amendment Regulation (EU) 2020/1245.

Decreto Ministeriale 21 marzo 1973

The adhesive is in compliance with the General requirements and Positive list in Annex II, Section 3, Part D of the Italian Ministerial decree 21/03/1973 (DM 21/03/73 e smi) and amendments.

Epoxy Regulation

The adhesive does not contain any epoxy derivatives as part of its formulation, i.e. BADGE and its derivatives, NOGE and BFDGE as mentioned in the European Regulation (EC) No 1895/2005.

BfR (Germany)

The components of the adhesive comply with the XIV. BfR recommendation for direct food contact.

FDA (USA)

The adhesive is in compositional compliance with the Indirect Food Additives regulation 21 CFR 175.105 'Adhesives'.

Packaging waste, TPCH

The heavy metal cadmium, lead, mercury and chromium^{VI} are not intentionally used in the manufacture of our straws. The sum of heavy metals cadmium, lead, mercury and chromium^{VI} incidentally present is below 100ppm. Therefore, our straws comply with the Directive 94/62/EC as amended, as well as the limit of US Model Toxics in Packaging Legislation by Toxics in Packaging Clearinghouse (TPCH), established by the Coalition of Northeastern Governors (CONEG).

CALIFORNIA PROPOSITION 65

We hereby confirm that our products do not contain any chemicals known to the State of California to cause cancer, birth defects or other forms of reproductive harm.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) are not intentionally added in the production of our product.

BSE

Our straws are manufactured without any derivatives of animal origin. There is no scientific reason to assume any risk of BSE transfer through them.

Allergens

Straws are manufactured without the intentional use of substances currently known to be or suspected of being food allergens.

SUBSTANCES WITH RESTRICTION, DUAL USE ADDITIVES - ADDITIVES CHEMICALLY IDENTICAL WITH A FOOD ADDITIVE OR FLAVOURING:

FCM no.	CAS no.	Name	SML / Limitation	DUAL USE /additive Chemically identical with a food additive or flavouring
21	-	Carbonic acid (as sodium salt, E 500)	-	YES
509	007664-38-2	Phosphoric acid (as sodium salt, E 339,340)	-	YES
252	110-44-1	Sorbic Acid (E 200)	-	YES
115	000064-19-7	Acetic acid (as sodium salt, E 262)	-	YES
451	002682-20-4	2-Methyl-4-isothiazolin-3-one	SML = 0.5 mg/kg	NO
-	026172-55-4	5-Chloro-2-methyl-4-isothiazolin-3-one	max 0.003 mg/dm ² in dispersion film	NO
-	002634-33-5	1,2-Benzisothiazolin-3-one	SML = 0.5 mg/kg	NO
-	52-51-7	2-Bromo-2-nitropropane-1,3-diol	max 0.032 mg/dm ² in dispersion film	NO
231	000108-05-4	Acetic acid, vinyl ester	SML = 12 mg/kg	NO

Food legislation restrictions on substances with E in the above table have been considered.

The SML / Limitations of substances in the table above are not exceeded based on cold water extraction analysis / migration analysis / are covered by the worst-case calculation and are not exceeded under the conditions of use, therefore, a specific monitoring is not required.

RISK MANAGEMENT

All raw materials used in the manufacture of our paper straws have been evaluated and the risk assessment for finished product food contact suitability has been carried out in accordance with the applicable legal provisions and CEPI food contact guidelines 2019.

Recycled paper is not used in the production of our paper straws and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils.

We also declare that substances such as phthalates, BPA, Bisphenols F and S, Bisphenol derivatives, glycol ethers, PVC-PVDC, Primary Aromatic Amines, Alkylphenols, APEO's, NPEO's, or any other endocrine disrupting chemicals, Fluorosurfactants, fluorinated substances, PFAS, PFOA/ PFOS, PBBs, PCB's, PAHs, PBDE's, photoinitiators, benzophenones, benzoates, 1-hydroxycycloheptylketone, 2-ethylanthraquinone, isopropylthioxanthone, 2-ethylhexyl-4-(dimethylamino)benzoate (EHDAB), ethyl-4-(diethylamino)benzoate (EDAB, are not being a part of the production of our products and the raw materials used do not contain any substance than can degrade into or be capable of releasing any of the above-mentioned restricted substances ensuring paper straws' compliance with European Framework Regulation (EC) no 1935/2004.

Furthermore, we declare the following for our paper straws:

The concentration of Cadmium (Cd) is < 0.002 mg/dm², the concentration of Lead (Pb) is < 0.003 mg/dm², the concentration of Mercury (Hg) is < 0.002 mg/dm² and the concentration of Pentachlorophenol (PCP) is < 0.1 mg/kg.

NIAS SCREENING ANALYSIS

The results of the screening analysis for not intentionally added substances (NIAS) gave no indication for any objections.

REACH REGULATION (EC) 1907/2006

To our knowledge and based on the information from our suppliers we can confirm that our products do not contain:

- Substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration above 0.1%
- Substances included in Annex XVII

MIGRATION REPORT 1

TYPE OF ANALYSIS	CONCLUSION	REGULATION OR PROTOCOL
Cold water extraction analysis	Pass	BfR XXXVI
Sensory analysis	Pass	Regulation (EC) No 1935/2004 article 3c.

Antimicrobial constituents	Pass	BfR XXXVI
Fastness of fluorescent whitened paper and board	Pass	BfR XXXVI
Optical brightener	Pass	BfR XXXVI
Screening of NIAS	No objections	Regulation (EC) No 1935/2004 article 3c.

MIGRATION REPORT 2 (BLACK COLORED PAPER)

TYPE OF ANALYSIS	CONCLUSION	REGULATION OR PROTOCOL
Specific migration	Pass	(EU) No 10/2011
Content analysis	Pass	(EU) No 10/2011
Cold Water extraction tests	Pass	BfR XXXVI
Antimicrobial constituents	Pass	BfR XXXVI
Colour fastness	Pass	BfR XXXVI
Sensory analysis	Pass	Regulation (EC) No 1935/2004 article 3c.
NIAS	No objection	Regulation (EC) No 1935/2004

MIGRATION REPORT 3 (MIXED COLORED PAPER)

TYPE OF ANALYSIS	CONCLUSION	REGULATION OR PROTOCOL
Specific migration of mineral oil	Pass	GERMAN MINERAL OIL ORDINANCE
Content analysis	Pass	BfR XXXVI
Cold Water extraction tests	Pass	BfR XXXVI

Antimicrobial constituents	Pass	BfR XXXVI
Colour fastness	Pass	BfR XXXVI
Sensory analysis	Pass	Regulation (EC) No 1935/2004 article 3c.

Full details based on the testing and direct comparison with limit values are available upon request.

Specification of the intended use or limitations:

- Type(s) of food intended to come into contact with the product:
 - o All aqueous, acidic and alcoholic foods and milk products
- Duration and temperature of treatment and storage while in contact with the food:
 - o Up to 40°C tested
- Ratio of the area of food contact material to the volume used to determine the compliance of the food contact material or article:
 - o mg/kg: for the EU-convention of 6 dm² packaging for 1 kg food
- Storage:
 - o Storage conditions: from 0° C up to 45°C, protect against moisture.
- Shelf life:
 - o 18 months (recommended)

Traceability of the product is ensured according to Regulation (EC) No 1935/2004 via the number of the production lot and the date of production displayed in the production carton.

Athens, 15/09/2021

Place/date



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Signature

Expires 3 years after date of issue