

Naples, 25/11/2025

To: Seda Germany

DECLARATION OF COMPLIANCE

Product: PS Black Hot Cup Lids
Items: C00660164, C00660156

Material description and intended food contact

This declaration certifies that the above-mentioned materials, produced by thermoforming of polystyrene black sheets, are suitable for direct contact with aqueous, alcoholic, dairy and fatty products, for any food contact condition that include hot-fill and/or heating up to a temperature T where $70\text{ }^{\circ}\text{C} < T < 100\text{ }^{\circ}\text{C}$ for a maximum of $t = 120/2^{((T-70)/10)}$ minutes, which are not followed by long term room or refrigerated temperature storage.

Legal compliance – on amendments to date

- Italian Ministerial Decree 21/03/1973 and subsequent amendments
- Regulation (EC) 1935/2004, articles 3, 11(5), 15, and 17, and subsequent amendments
- Regulation (EU) 10/2011 and subsequent amendments
- Regulation (EU) 2025/40 and subsequent amendments
- Imballplast products are manufactured in compliance with the European Regulation 2023/2006/EEC “on good manufacturing practice for materials and articles intended to come into contact with food”.

Statement on Genotoxic Substances, according to EU Reg. 1245/2020

Regulation (EU) 2020/1245 requires a communication within the supply chain of possible genotoxic substances, if it cannot be ruled out that a migration of more than 0.00015 mg/kg food or food simulant is expected from the final material.

Based on the information received from our raw material suppliers and the knowledge of our production process, we confirm that no potential genotoxic substance, not authorized in any positive list of European or National legislation, is intentionally used to manufacture the final article.

Dual Use Additives (as per EC Reg. 1129/2011, 1333/2008, 1334/2008)

Based on our suppliers' declaration, the raw materials used to produce the above-mentioned items do not contain dual use Additives

Food Safety Testing

All the food safety analysis has been performed on similar items representative of the product supplied (made of same raw materials and manufactured using same process).

The testing protocol was designed based on declaration of our raw material suppliers', our manufacturing process and final food application.

Overall Migration and Specific Migration

The overall and specific migration have been performed on representative samples of the finished product, in simulant A (Ethanol 10%), B (Acetic Acid 3%) and D2 (Rectified Olive Oil).

Contact test conditions are 2 hours at 70°C.

The analysis is conducted by Total Immersion, with a ratio of exposed surface to volume of simulant of (1.04/1.5) dm²/dl.

The overall migration limit (10 mg/dm² or 60 mg/kg) stipulated in the Commission Regulation (EU) 10/2011 is not exceeded.

The specific migration of the following restricted substances is also respected:

- The Migration of Primary Aromatic Amines (PAAs) is below the SML limit of 0.02 mg/kg, according to Reg. (EU) 10/2011.
- The Migration of Metals, as required by Reg. (EU) 10/2011, modified by Reg. (EU) 1245/2020, is in line with the limits defined by the aforementioned Regulations.
- The Specific Migration of La, Eu, Gd, Tb, as required by Reg. (EU) 1245/2020, is below the SML of 0.05, expressed as a sum.
- The Specific Migration of 1,3-butadiene (CAS Nr. 0000106-99-0- Rif. Nr. 13630) is below the limits of 1 mg/kg
- The Specific Migration of 2,4-bis (octylthiomethyl)-6-methylphenol (Irganox 1520) REF. 40020-CAS 110553-27-0) is below the SML of 5 mg/kg
- The specific Migration of Irganox 245 (CAS NR.36443-68-2 - REF 94400) is below the SML of 9 mg/kg

Heavy Metals

According to limit set in the EU Directive 94/62 (art.11), the sum of the concentration levels of Cadmium (Cd), Mercury (Hg), Lead (Pb), and Hexavalent Chromium (Cr+6) is <100mg/kg.

Statement on Bisphenol A, other bisphenols or bisphenol derivatives

Based on our supplier's declaration, the raw material used to produce the above-mentioned items are made without the intentional use of BPA, other hazardous bisphenols or hazardous bisphenol derivatives. Furthermore, it is hereby confirmed that no BPA or other hazardous bisphenol or hazardous bisphenol derivative has been used in our production process.

General

By observing the above regulations, we have fulfilled our duty of care regarding the compliance of the product we supply.

The product is intended for short term contact with hot soft beverages, it is the responsibility of the user to verify its suitability for his own intended food application.

This statement applies only to above identified products and is based on available data, which may include but is not limited to, supplier compliance statements, product composition, product analysis of similar items and our use of good manufacturing practices.

The Customer is responsible for the product safety, lawfulness (except as provided specifically in this Declaration) and technical suitability for its intended application use. Any non-conforming use of this product is outside the scope of this Declaration.

The guarantees of use are expressly indicated in this document.

This letter is intended for your company only and replaces previous Certificates of Compliance. It is valid for 2 years unless major legislation changes occur and only when signed by us. After a break in delivery lasting more than 12 months, this letter ceases to be valid for new deliveries of the relevant product.

AQ Mgr,

Ing. Lucio Vignes

