

## DECLARATION OF COMPLIANCE

04/06/2026

**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:

### 1. DESCRIPTION OF MATERIALS AND ARTICLES

#### **Paper Bags**

Brown window paper bags without print

13330189

13330205

13330225

PG ID: FIUT-CS6H28

ID: FIUT-CS6H281

## 2. INTENDED USES

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

Aqueous

Fatty

Dry

Fruits and Vegetables

Eggs

In following conditions of temperature and time\*:

Frozen - refrigerated ( for >10 days)

Lukewarm (Up to 40°C for >10 days)

Hot-fill (Up to 70°C for Up to 2 hours)

High temperature application (Up to 100°C for Up to 15 min)

\* 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 above fulfil 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

## 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:

- Regulation (EU) No 2025/40 on packaging and packaging waste (PPWR) Article 5(4) on heavy metals (sum of Pb, Cd, Hg, Cr(VI) 100 ppm)
- Regulation (EU) No 2025/40 on packaging and packaging waste (PPWR) Article 5(5) on PFAS (based on material supplier statements)
- Regulation (EU) 2024/3190 on the use of bisphenols in certain materials and articles intended to come into contact with food (as amended)
- 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 (EU) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per dm<sup>2</sup> 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 6 dm<sup>2</sup>/dm<sup>3</sup>.

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE
Olive oil	10 days	40 °C

## Substances with restriction

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

**CAS: -**

PMREF Number: 39090

Substance: n,n-bis(2-hydroxyethyl)alkyl(c8- c18)amine

Restriction (mg/kg): 1.2

**CAS: -**

PMREF Number: 39120

Substance: n,n-bis(2-hydroxyethyl)alkyl(c8- c18)amine hydrochlorides

Restriction (mg/kg): 1.2

**CAS: 0000077-92-9**

PMREF Number: 14680

Substance: citric acid

Restriction (mg/kg): 60

**CAS: 0026741-53-7**

PMREF Number: 38820

Substance: bis(2,4-di-tert-butylphenyl) pentae- rythritol diphosphite

Restriction (mg/kg): .6

**CAS: -**

PMREF Number: 56486

Substance: glycerol, esters with acids, alip- hatic, saturated, linear, with an even number of carbon atoms (c14-c18) and with acids, aliphatic, unsatu- rated, linear, with an even number of carbon atoms (c16-c18)

Restriction (mg/kg): 60

**CAS: 0002082-79-3**

PMREF Number: 68320

Substance: octadecyl 3-(3,5-di-tert-butyl-4- hydroxyphenyl)propionate

Restriction (mg/kg): 6

**CAS: 0000057-11-4**

PMREF Number: 24550

Substance: stearic acid

Restriction (mg/kg): 60

**CAS: 0038613-77-3**

PMREF Number: 92560

Substance: tetrakis(2,4-di-tert-butyl-phenyl)-4,4'-biphenylene diphosphonite

Restriction (mg/kg): 18

**CAS: 0013463-67-7**

PMREF Number: 93440

Substance: titanium dioxide

Restriction (mg/kg): 60

**CAS: 0154862-43-8**

PMREF Number: 38840

Substance: bis(2,4-dicumylphenyl)pentaerythritol-diphosphate

Restriction (mg/kg): 5

**CAS: 0007631-86-9**

PMREF Number: 86240

Substance: silicon dioxide

Restriction (mg/kg): 60

**CAS: 0000592-41-6**

PMREF Number: 18820

Substance: 1-hexene

Restriction (mg/kg): 3

**CAS: 0000080-62-6**

PMREF Number: 21130

Substance: methacrylic acid, methyl ester

Restriction (mg/kg): 6

**CAS: 0000097-90-5**

PMREF Number: 20440

Substance: methacrylic acid, diester with ethyleneglycol

Restriction (mg/kg): .05

**CAS: 0027676-62-6**

PMREF Number: 95360

Substance: 1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6-(1h,3h,5h)-trione

Restriction (mg/kg): 5

## 6. DUAL USE SUBSTANCES

The products listed above may contain following dual use substances:

**CAS: 31566-31-1**

E Number: E471

Substance: glycerol monostearate

Restriction: unknown

PM Ref. No.: unknown

**CAS: 0001592-23-0**

E Number: E470

Substance: Calcium stearate

Restriction: unknown

PM Ref. No.: unknown

**CAS: 0007631-86-9**

E Number: E551

Substance: Silicium Dioxide

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

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.

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