

DECLARATION OF COMPLIANCE

20/02/2026

DEAR CUSTOMER

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

1. DESCRIPTION OF MATERIALS AND ARTICLES

Fiber lids

581-70

591-70

592-70

596-70

597-70

Test report reference:

AR-23-JR-014892-02; Eurofins Consumer Product Testing Germany

AR-23-JR-018074-03; Eurofins Consumer Product Testing Germany

p2. INTENDED USES

Products are intended to be used together with cold and hot drink paper cups to cover and to avoid spillages of beverages (such as soft drinks and juice) packed in the cups.

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

Aqueous

Acidic

Dairy

Alcohol < 6%

In following conditions of temperature and time*:

Hot and cold drinks (Up to 90°C for Up to 2 hours)

The fiber lid can be used up to a max filling temperature of 90°C. Depending on the Filling medium and it`s filling temperature, the product may start to soften after 10 minutes of use. Duration and intensity of contact of mouth, teeth or tongue have an Influence on this time. Keep the product during their storage at dry conditions.

* 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:

Europe

- 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
- Lebensmittel-, Bedarfsgegenstände- und Futtermittelgesetzbuches (LFGB) §31
- French DGCCRF - Information Note No. 2014-108 and DM/4B/COM/004*
- French Loi n° 2010-729 du 30 Juin 2010 modifiée par la loi n° 2012-1442 du 24 décembre 2012 aiming at the suspension of the manufacture, the import, the export and the placing on the market of any food packaging containing bisphenol A

**) The compliance confirmed by the fiber supplier.*

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:

- 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
- 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 1935/2004 materials and articles shall not under normal or foreseeable conditions of use transfer their constituents to foodstuffs in quantities which could endanger human health or bring about unacceptable change in the composition of the food or change organoleptic characteristics of the food.

Following migration tests were conducted:

5.1 OVERALL MIGRATION

| SIMULANT | TIME | TEMPERATURE |
|----------------|---------|-------------|
| 3% acetic acid | 2 hours | 70°C |
| 95% ethanol | 2 hours | 60°C |
| Iso-octane | 30 min | 40°C |

6. DUAL USE SUBSTANCES

As per statements we have received from our suppliers, none of the raw materials contain dual use substances.

7. OTHER SUBSTANCES

- Bisphenol A (BPA) is not intentionally used in the products listed in section 1. A representative sample has been tested for BPA with not detectable result (LOD 0.05 mg/kg). (Representative sample: UK hot lid, report AR-23-JR-018074-03)
- PFOA and PFOS, or any other PFAS (such as PFNA or PFHXS) are not intentionally used in the products listed in section 1. This information is based on the information provided by our raw material supplier and tests have been done by an external institute against the Fluorine containing substances or compounds, were within specification values.
- Phthalates are not intentionally used in the product, and you can also mention: A representative sample has been tested for migration of phthalates (BBP, DEHP, DBP, DINP, DIDP) with not detectable results (LOD 0.002 – 0.003 mg/kg food) (Representative sample: UK hot lid, report AR-23-JR-018074-03)
- Nanomaterials are not intentionally used in the product. Justification: ALL-FORM-10(4) or corresponding information in place from raw material suppliers.

- MOAH are not intentionally used in the product and that a representative sample has been tested for migration of MOSH/MOAH with not detectable result (LOD 0.1 mg/kg food), (Representative sample: UK hot lid, report AR-23-JR-018074-03)

- Non-intentionally added substances (NIAS) Under the legislation, 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. 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.

Huhtamaki Foodservice Germany Operations GmbH & Co. KG
Bad Bertricher Str. 6-9
56859 ALF/ Mosel
Germany
Tel: +49 - (0) 654 2 802 0
Fax: +49 - (0) 654 2 802 139

Email: [info.alf\(at\)de.huhtamaki.com](mailto:info.alf(at)de.huhtamaki.com)