

2023 08 25

Declaration of Compliance

Name and address of company: JSC Peraltis, Veterinaru str. 48, Biruliskes, Kaunas Region, LT-54469, Lithuania

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Name of the product: disposable paper cups

Raw material: Bleached cup board with PE coating Baseboard grammage: Ranges between 170 g/m2 to 330 g/m2 PE/ Coating: The PE coating can be one side or both sides of paperboard.

For the purpose to achieve high chemical and microbiological purity only fresh and virgin fibers and food contact approved chemical additives are used as raw material in the production of paperboard. The pulp and paper manufacturing process conforms with established technology involving the use of generally recognizes chemicals.

We hereby declare that this extrusion coated paperboard which are using to paper cups before conversation complies where applicable and under foreseeable conditions of use with requirements of Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. This extrusion coated paperboard is produced in accordance with Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

This extrusion coated paperboard is intended for use under the following conditions of temperature and time:

- Freezer/fridge
- any long term storage at room Room temperature (up to 40° C for more than 24 hrs)
- Hot-fill*

*"hot-fill" means the filling of any article with food with a temperature not exceeding 100° C at the moment of filling, after which the food cools down to 50° C or below within 60 minutes, or to 30° C or bellow within 150 minutes.

We hereby declare that coated paperboard which are using for paper cups production can be used also and for cold drinks, which pH is 3,0 do 4,0. The PE coated paperboard is suitable to be used for all kind of cold drinks any condition that can be regarded as less severe than those listed above.



The ratio of food contact surface area to volume used to establish the compliance of the material. The compliance testing was done under conditions set out in Regulation EC No. 10/2011 using a surface to volume (s/v) contact ration of 6 dm²/kg.

This extrusion coated paperboard is not intended for use under the following conditions and temperatures:

- De-freezing and /or heating of food (e.g. ready meals) in microwave oven
- Convection oven

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Paperboard

The paperboard complies where applicable and under foreseeable conditions of use with

Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food

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

BfR Recommendation XXXVI, Paper and board (2023)

Commission Regulation (EU) 10/2011 as amended by 2020/1245 on plastic materials and articles intended to come into contact with food.

<u>Plastic layer</u>

All the raw materials used in the extrusion coating comply with the relevant requirements and under foreseeable conditions of use with

Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food

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

Commission Regulation (EU) 10/2011 as amended until 2019/1338 on plastic materials and articles intended to come into contact with food.

<u>SML's – plastic layer</u>

Substances used in the board extrusion coating do not contain any monomers or additives with specific migration limit (SML) according to Commission Regulation (EU) 10/2011

Dual Use Additives - plastic layer

The used substances in the extrusion coating do not contain any additives that are authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008.

Analyses/migration tests

The overall migration tests have been performed on representative samples of the plastic layer of multi-material multi-layer structure according to EN 1186 with the following results. The contact area to volume ratio in the migration tests was 50ml/dm². The overall migration limit 10mg/dm² stipulated in the Regulation (EU) Nr. 10/2011 is not exceeded.

- Simulant: 3 % acetic acid, 10days / 40°C < 10mg/dm 2
- Simulant: 10 % Ethanol, 10days / 40°C < 10mg/dm²
- Simulant: 95 % Ethanol, 10days / 40°C < 10mg/dm²
- Simulant: iso-octance, 2days / 20°C < 10mg/dm²

Food contact Guideline

The Food Contact Guidelines for the Compliance of Paper and Board Materials and Articles for food contact provides harmonized approach for self-regulation of paper and board producer. Stora Enso as a company supports and operates according to the Food Contact Guideline.

Compliance with US food contact legislation

Cupforma Natura PE and Cupforma Natura 2PE are plastic coated paperboards. Based on the FDA compliance information available for each layer, Stora Enso has determined that Cupforma Natura PE and Cupforma Natura 2PE boards comply with the Federal Food, Drug and Cosmetic Act and applicable food additive regulations for use in contact with food types I, II, III, IV A-B, V, VII A-B, VIII and IX under conditions of use C through G and with food types VI A-C under conditions of use D through G as described in tables 1 and 2 of 21 C.F.R. §176.170.

Analyses / paperboard

Please note that the following information is applicable only for the paperboard layer in this multimaterial multilayer structure.

Compliance with BfR Recommendation XXXVI

The paperboard complies with the requirements in BfR Recommendation XXXVI, Paper and Board as follows. Analyses have been performed on representative samples of paperboard.

Heavy metals:

Cadmium (Cd) < 5 μ g/l in the cold-water extract of the paperboard

Lead (Pb) < 10 μ g/l in the cold-water extract of the paperboard

Chloropropanols:



1,3-DCP (1,2-dichloro-2-propanol) < 2 μ g/l in the hot-water extract of the paperboard

3-MCPD (3-monochloropropane diol) < 12 μ g/l in the hot-water extract of the paperboard

Formaldehyde: Analysis has been performed according to EN 1541. The amount of formaldehyde is < 1 mg/dm2.

Optical brightening agents: Optical brightening agents, OBAs, are not used as raw material or intentionally added in the production of paperboard. Analysis has been performed according to EN 648. There was no visible transfer (grade 5) for any of the test fluids.

Colour fastness: Analysis has been performed according to EN 646. There was no visible transfer (grade 5) for any of the test fluids.

Hemmhof test: Analysis has been performed according to EN 1104. There is no transfer of antimicrobial constituents.

We do not add surface biocides on top of the paperboard.

Other heavy metals

Chromium VI < 0,25 mg/kg

Mercury < 0,3 mg/kg

Nickel < 2,0 mg/dm² as required in Finnish KTM decree 268/1992

Chromium < 2,0 mg/dm² as required in Finnish KTM decree 268/1992

Lead < 0,50 mg/dm² as required in Finnish KTM decree 268/1992

Cadmium < 0,10 mg/dm² as required in Finnish KTM decree 268/1992

Dioxin in paperboard

The content of 17 2,3,7,8-substituted toxic congeners of polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) and 12 dioxins like PCB's analyzed in representative samples of paperboard is less than 1 ppt WHO-TEQ.

<u>PCB</u>

Analyses have been performed on representative paperboard samples for polychlorinated biphenyls (PCB) according to EN ISO 15318. The amount of PCB is below < 2.0 mg/kg.

<u> PCP</u>

Analysis has been performed on representative paperboard sample for pentachlorophenol (PCP) according to EN ISO 15320. The amount of PCP is < 0.1 mg/kg.



Substances / extrusion coated paperboard

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that we do not analyze the extrusion coated paperboard for the substances listed below. Information below is based on information given by our chemical and polymer suppliers.

<u>GMO</u>

We hereby confirm that Genetically Modified Organisms (GMO) as defined by European Union^{*} are not intentionally added in the production this extrusion coated paperboard. Our suppliers can however not exclude adventitious and technically unavoidable contamination^{**}.

* http://ec.europa.eu/food/food/biotechnology/index_en.htm

** Regulation 1830/2003 on traceability and labeling of GMO; "The adventitious or technically unavoidable presence of GM-crops in conventional crops may occur as a result of seed production, cultivation, harvest, transport and processing. As long as the level of such contamination remains below the current 0.9 % legislative limit, food ingredients can be considered as not being produced from GM raw materials."

Animal origin

We hereby confirm that no additive of animal origin is intentionally added in the production of extrusion coated paperboard.

Based on our current knowledge, this product could qualify with vegan certification criteria.

<u>BSE</u>

We hereby confirm that no substances causing Transmissible Spongiform Encephalopathies, TSEs including Bovine spongiform encephalopathy, BSE and Creutzfeldt Jakob Disease, CJD is intentionally added in the production of extrusion coated paperboard.

Based on or current knowledge, this product could quality with vegan certification criteria.

Food allergens

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II, the following food allergens or products derived thereof are not intentionally added in the manufacture of extrusion coated paperboard:

- Crustaceans and products thereof

-Eggs and products thereof

-Fish and products thereof*



-Peanuts and products thereof

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- -Soybeans and products thereof*
- Milk and products thereof*
- Nuts and products thereof*
- -Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO2.
- -Lupin and products thereof
- Molluscs and products thereof
- * Please notice the exceptions in the Regulation (EU) No 1169/2011 Annex II

According to Commission Regulation (EC) No 828/2014 foodstuffs may be sold as 'gluten-free' if the gluten content does not exceed 20 mg/kg in the food as sold to the final consumer. Some starches used in the production of paperboard contain minor amounts of gluten. Based on the worst-case calculations the gluten content of paperboard does not exceed 20 mg/kg and thus laminated paperboard is also considered as "gluten-free".

Phthalates

We hereby confirm that no phthalates are intentionally added in the production of extrusion coated paperboard.

Bisphenol A

We hereby confirm that no bisphenol A is intentionally added in the production of extrusion coated paperboard.

Titanium dioxide

We hereby confirm that no Titanium dioxide is intentionally added in the production of paperboard.

Oxo-degradable components

We hereby confirm that no oxo-degradable components are intentionally added in the production of the plastic films.

Packaging and Packaging Waste Directive



The paperboard complies with the Packaging and Packaging Waste directive 94/62/EC as amended.

The sum of lead, cadmium, mercury and hexavalent chromium in the paperboard is less than 100 ppm (EN 13428).

The level of substances hazardous* to the environment in the paperboard is less than 0,1% (EN 13428).

* Requirements for classification of substances or preparations dangerous to the environment and assigned the hazard statements H400, H410 and H411 according to the Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

The extrusion coated paperboard is suitable for recovery by ;

Material recycling (EN 13430)

Energy recovery (EN 13431)

Composting and biodegradation (EN 13432), certified by TUV-Austria*, certification number S0249: http://okcompost.be/en/certified-products/

REACH Regulation (EC) 1907/2006

Stora Enso continuously monitor the development of the Candidate List of Substances of Very High Concern, the substances authorization as well as any restrictions applicate to our use. To our knowledge and based on the information from our suppliers today we can confirm that none of our articles contains:

¹ Substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorisation) in a concentration above 0.1% (w/w).

CMR substances

Based on information from Stora Enso of chemical additive, substances classified as "carcinogenic", "mutagenic" or "toxic for reproduction" in Regulation (EC) 1272/2008, in concentrations over the legislative limits stated in the materials data sheets for them chemical products, are not used as raw material and are not intentionally added in the production the production of paperboard.

Intentionally added shall mean deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance or quality. Please note that his information is based on the information gained from our supplier, and we do not routinely test our products against these substances.

<u>Inks:</u>



The ink group can be used for flexo- and gravure printing.

They are highly pigmented, paa-free and comply with the requirements of standard EN 646. There is no certificate from a test laboratory. Because of their excellent resistance to animal and vegetable fats, they are suitable for the printing of bakery products, as well as wrapping paper for butter and margarine.

The information was prepared on the basis of the results of the manufacturer of the raw material, manufacture of raw material and the laboratory of National Public Health Surveillance Laboratory of Lithuania.

Storage recommendations

The product properties, according our supplier of raw materials specifications, are guaranteed for 12 months after the production date. In order to ensure product safety, product must be well packed and stored indoors, sheltered from rain and snow. The recommended storage conditions are 50-55% relative humidity and 20-23° C.

For the product treatment, we recommend using product within 12 months of the production date; after this period, the product should be tested before using.

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