



Sompolno, 14.02.2020

PAPSTAR GmbH
Daimlerstrasse 4-8
53925 Kall

DECLARATION OF CONFORMITY

As requested we confirm that our articles quality : paper plates, trays, boxes
made using virgin fibre cardboard laminated with PE,PP,PET

stay in accordance to current global law regulations.

The product has been tested by an independent laboratory for suitability for food contact and compliance with the regulations and recommendations, taking also into consideration the declarations of compliance provided by our raw materials and additives suppliers and additional information obtained on a confidential basis

Extrusion coating layer

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

Complies when applicable and under foreseeable conditions of use

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

Complies when applicable and under foreseeable conditions of use

-European Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food

The PE coated paperboard is suitable to be used for all kind of food types:

- Up to temperature of max. 100 °C (212 °F) / up to 15 minutes followed by any time at room temperature
- Or up to temperature of max 70 °C (158 °F) / up to 2 hours followed by any time at room temperature
- Or any condition that can be regarded as less severe
- The extrusion coated paperboard may only be in contact with food on the PE coated side

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Germany:

BfR (Bundesinstitut für Risikobewertung)

XXXVI. Paper and board for food contact (version 1.9.2017)

Both dry and non-fatty foods as well as moist and fatty foods

USA:

The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 (“Components of paper and paperboard in contact with aqueous and fatty foods”) and 176.180 (“Components of paper and paperboard in contact with dry food”)

All food types under FDA’s Conditions of Use C (“Hot filled or pasteurized above 150 °F”) through H (“Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use”)

Paperboard

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

Complies when applicable and under foreseeable conditions of use

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

Complies when applicable and under foreseeable conditions of use

Germany:

BfR (Bundesinstitut für Risikobewertung)

XXXVI. Paper and board for food contact (version 1.9.2017)

Both dry and non-fatty foods as well as moist and fatty foods

Italy:

D.M. 21/3/1973 and following updates and amendments concerning composition requirements (fillers, auxiliary substances and fibrous matters) for food products for which migration tests are required for, purity requirements (PCBs, migration of lead) and migration of phenols and cresols

Both – dry and not fatty foods as well as moist and fatty foodstuffs

USA:

The Federal Food, Drug, and Cosmetic Act and all applicable food additive regulations, including: 21 C.F.R. §§ 176.170 (“Components of paper and paperboard in contact with aqueous and fatty foods”) and 176.180 (“Components of paper and paperboard in contact with dry food”)

All food types under FDA’s Conditions of Use A (“High temperature heat-sterilized (e.g., over 212°F)”) through H (“Frozen or refrigerated: Ready-prepared foods intended to be reheated in container at time of use”)

Overall migration

Overall migration testing requirements do not apply to plastic layers in multi-material multi-layer materials and articles according to Article 14(4) of Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.

However, as a responsible food contact disposables manufacturer, ABC-PAK has conducted voluntary migration testing for PE (polyethylene) coated paperboards to ensure the safety of the produced material.

Overall migration of the PE coated side(s) of the paperboard has been tested by an independent, third party, accredited laboratory in accordance with methods EN 1186-1 and EN 1186-5 (Materials and articles in contact with foodstuff). Overall migration is below the 10 mg/dm² limit in all tested conditions.

We hereby warrant that ABC-PAK as well as our supplier does not use the substances listed below in its production processes. Based on testing and/or information received from raw material suppliers this product is free from substances listed below or, where these substances exist as traces in the raw materials or are generated during the

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manufacturing process, their content is below the limits specified in applicable legislation or agreement, and never exceeding the threshold limit of 0,1% by weight of the product.

1. Recycled material and optical brightening agents (OBA)

This product is manufactured from virgin materials and does not contain any recycled materials. This product is OBA free as optical brightening agents are not used during the manufacturing process.

2. Chlorine

Pulps used in production of the product come from ECF (elementary chlorine free) and TCF (total chlorine free) processes. Chemical pulp process is ECF and BCTMP process is TCF.

3. Fluorine

According to third-party accredited laboratory testing, fluorine has not been detected in a water extract prepared from the product according to EN 645 (detection limit 0.05 µg/dm²).

Fluorinated chemicals, such as perfluorinated chemicals (PFCs) including perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid and its derivatives (PFOS) and other per- and polyfluoroalkyl substances (PFASs), are not used in the manufacturing of the product.

The following three specific perfluoroalkyl ethyl containing food-contact substances have not been used in the manufacturing of the product as listed in the rule 81 FR 5 by the Food and Drug Administration on 01/04/2016:

1. Diethanolamine salts of mono- and bis (1H, 1H, 2H, 2H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solids basis
2. Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl)thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2)
3. Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis[[[gamma], [omega]-perfluoro C4-20 alkylthio]methyl]-1,3- propanediol, polyphosphoric acid and ammonium hydroxide

4. Heavy metals

No heavy metals are intentionally added during the manufacturing process.

- Heavy metal traces are under the limits regulated in Finnish legislation 268/1992

Any traces of lead, mercury, cadmium and chromium (VI) present in the product do not exceed 100 ppm in total by weight as regulated in

- Directive 94/62/EC on Packaging and Packaging Waste and its amendments.
- CONEG: The Model Toxics in Packaging Legislation

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5. ResAP (2002) 1

This product complies with the restriction limits set forth in Tables 1 and 2 of Council of Europe Resolution ResAP (2002) 1 on paper and board materials and articles intended to come into contact with foodstuffs.

6. Genetically modified organisms (GMO)

No GMO raw materials are used in the production process. GMO as defined by EU Directive 2001/18/EC means an organism, with the exception of human beings, in which the genetic material has been altered in a way that does not occur naturally by mating and/or natural recombination.

7. Animal origin, Halal, Kosher

Raw materials of animal origin, ethanol or grape/fruit/grain based alcohol are not used in the manufacturing of the product. However, this product is not certified according to Halal or Kosher requirements.

8. Conflict minerals

Chemicals containing gold (Au), tantalum (Ta), tin (Sn) and wolfram (W) also known as tungsten, are not used in the manufacture of the product.

9. POP Regulation and brominated flame retardants

Substances listed in the Regulation (EC) No 2019/1021 on persistent organic pollutants "POPs" Annex I, including for example polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).

10. RoHS 2

Directive 2011/65/EU (RoHS 2 Annex II) on the restrictions of the use of certain brominated flame retardants, heavy metals and phthalates in electrical and electronic equipment.

11. California Proposition 65

Substances listed in California Proposition 65 The Safe Drinking Water and Toxic Enforcement Act of 1986 are not used as raw materials. In case listed substances are present as traces, the exposure is estimated to be below relevant safe harbor levels. If no safe harbor level is given, an internal risk assessment has been performed to show that the anticipated exposure level will not pose a significant risk of cancer or reproductive harm.

12. Endocrine disrupting chemicals (EDC)

Substances listed in European Commission Final Report "Towards the establishment of a priority list of substances for further evaluation of their role in endocrine disruption" Annex 15 or ECHA's endocrine disruptor (ED) assessment list (updated 25.10.2018)

13. Ozone depleting substances

Substances listed in Regulation (EC) No. 1005/2009 on substances that deplete the ozone layer.



14. UNEP 12 Chemicals, Persistent organic pollutants

Substances listed in Montreal Protocol 1987.
Aldrin, Chlordane, Dieldrin, DDT, Endrin, Heptachlor, Hexachlorobenzene, Mirex, Toxaphene, Polychlorinated biphenyls (PCBs), Dioxins and Furans as listed in United Nations Environment

15. Epoxy derivatives

Programme 1997 and Regulation (EC) 850/2004.
2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) as listed in Regulation (EC) No. 1895/2005.

16. Other substances of concern

Anthraquinone
Asbestos
Azocolourants and azodyes as defined in Annex XVII of REACH
Benzophenone and hydroxybenzophenone
Bisphenol A and Bisphenol-A DiGlycidyl Ether (BADGE)
Bisphenol F and Bisphenol-F DiGlycidyl Ether (BFDGE)
Bisphenol S
Butylated hydroxyanisole (BHA)
Butylated hydroxytoluene (BHT)
Colophony
Creosote
Fragrances
Isopropylthioxanthone (ITX)
Melamine
Natural rubber latex materials
Nonylphenols and nonylphenol ethoxylates, TNPP
Novolac glycidyl ethers (NOGE)
Polyvinylchloride (PVC)
Titanium dioxide
Triclosan

REACH

We hereby warrant that the requirements of REACH Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals are fulfilled and only chemicals complying with the provisions laid down in the regulation are used.

This product complies with the relevant restrictions set forth in Annex XVII of REACH Regulation on restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles. Furthermore, substances subject to authorisation listed in Annex XIV are not used.

All ABC-PAK products made with virgin fibre board coated with PE,PP,PET stay in accordance to above mentioned rules and can be safely use to direct contact to dry and not fatty as well as moisty and fatty foodstuffs.

SOMPOLNO 14.02.2020
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