

## CONFORMANCE DECLARATION

03/04/2023

On the basis of information received from our raw material suppliers, and the analysis conducted by independent laboratories, we hereby confirm that the products we supply do meet the requirements put forward in the legal framework presented below.

### 1. DESCRIPTION OF PRODUCTS

HBCP0001A Small food to go box no window  
HBCP0002A Medium food to go box no window  
HBCP0003A Large food to go box no window  
HBCP0004A Small food to go box & window  
HBCP0005A Medium food to go box & window  
HBCP0006A Large food to go box & window

### 2. DESCRIPTION OF MATERIALS

HBCP-0001A, 0002A, 0003A - Corrugated PET-lined kraft paper / kraft flute / Grease-resistant outerpaper. Contains starch.

HBCP-0004A, 0005A, 0006A - Corrugated PET-lined kraft paper / kraft flute / Grease-resistant outerpaper. PET window film. Contains starch and water-based adhesives.

| Item      | PET window film size | % PET |
|-----------|----------------------|-------|
| HBCP0001A | -                    | 5     |
| HBCP0002A | -                    | 5     |
| HBCP0003A | -                    | 5     |
| HBCP0004A | 83x138               | 8.45  |
| HBCP0005A | 119x129              | 8.52  |
| HBCP0006A | 119x192              | 9.08  |

### 3. INTENDED USES

**Product(s) listed above can be in contact with following food stuffs:**

All types of foodstuffs, including aqueous food stuffs, fatty food stuffs and dry foods.

**In following conditions of temperature and time\*:**

Testing has confirmed the suitability of the above product(s) for ovenability up to 220 °C for 30 mins (food interface temperature) which also covers use in a microwave. Packaging also suitable for long-term storage\*\*

\*\*Long-term storage – the overall migration testing covers indefinite storage use in all conditions, including refrigeration and frozen.

\*NOTE: It is the obligation of the recipient of this declaration to assess and ensure that the packaging is technically suitable for the aimed processing and downstream use circumstances. Although the frozen temperature is covered for 0 Kelvin (-273°), the starch will start to break down at -20°, as per the Technical Specification.

## 4. LEGISLATION

We confirm that the products listed in section 1 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.
- 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.
- Federal Institute for Risk Assessment BfR XXXVI/2, Paper and Board for Baking Purposes.

## 5. FURTHER LEGISLATION

We confirm that the products listed above fulfil the requirements on products 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)
- EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles.
- Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys regarding the threshold limits set for Antimony (Sb), Arsenic (As), Barium (Ba), Cadmium (Cd), Chromium (Cr), Lead (Pb), Mercury (Hg), Selenium (Se).

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## 6. OVERALL MIGRATION

According to Regulation (EU) No 10/2011 materials and articles shall not transfer their constituents to food simulants in quantities exceeding 10 mg of total amount of constituents released per dm<sup>2</sup> of food contact surface. The result was calculated assuming the conventional surface to volume ratio of 6 dm<sup>2</sup> per 1 kg of food.

|                                      |           |             |
|--------------------------------------|-----------|-------------|
| Overall migration - food simulant D2 | olive oil | 2h / 175 °C |
| Overall migration - food simulant B  | 3% AA     | 4h / 100°C  |
| Overall migration - food simulant A  | 10% EtOH  | 4h / 100°C  |

## 7. SPECIFIC MIGRATION

According to Regulation (EU) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding the specific migration limits, expressed in mg of substance per kg of food, set out in Annex I of the Regulation.

### Substances with restriction (as applicable)

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

| Test Method  | Food simulant | Test conditions               |
|--|---------------|-------------------------------|
| * Specific migration - glycols <sup>7) 10) 11) 13) 9)</sup><br>PN-EN 13130-1:2006; PN-EN 13130-7:2008                          |               |                               |
| Specific migration - diethylene glycol [CAS: 111-46-6; Ref.: 13326, 15760, 47680]  | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |
| Specific migration - ethylene glycol [CAS: 107-21-1; Ref.: 16990, 53650]   | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |
| * Specific migration - terephthalic acid and isophthalic acid <sup>7) 11) 13) 9)</sup><br>PN-EN 13130-2:2007                   |               |                               |
| Isophthalic acid [CAS: 121-91-5; Ref.: 19150]  | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |
| Terephthalic acid [CAS: 100-21-0; Ref.: 24910]   | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |
| * Specific migration - antimony trioxide [CAS: 1309-64-4; Ref.: 35760] <sup>7) 11) 13) 9)</sup><br>PB-204 ed. VI of 05.10.2020 |               |                               |
| Specific migration - antimony trioxide [CAS: 1309-64-4; Ref.: 35760]   | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |
| Specific migration - vinyl acetate [CAS: 108-05-4; Ref.: 10120] <sup>7) 11) 13) 9)</sup><br>CEN/TS 13130-9:2005                | 95% EtOH      | 30h / 60°C<br>+ 10d /<br>20°C |

## 8. DUAL USE SUBSTANCES

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

## 9. OTHER SUBSTANCES

### 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.

### Bisphenol A (BPA)

Huhtamaki does not intentionally use or add bisphenol A to its products.

## 10. TRACEABILITY

Traceability is achieved by reference to job bag/batch number which can be located on the outer case label and/or by PO number.

This certificate is valid until there substantial change 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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