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## CONFORMITY DECLARATION

**For:**

Paper cups coated polyethylene made of heat sealing technology with print.

Product description:

Polyethylene coated cardboard with print. A polyethylene layer is applied to one side of the cardboard and is intended for food contact applications. The packaging is made by thermal welding technology. Offset printing with the use of inks and varnishes with reduced migration.

We hereby certify that our products comply with the following global food contact laws and regulations. Informed compliance applies to both sides of the product. The product has been tested by an independent, accredited laboratory for suitability for contact with food and compliance with regulations and recommendations, including declarations of compliance provided by our manufacture and their suppliers of raw materials and additives and additional information obtained in confidence:

- ***Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food with amendments (with amendments). Article complies with the requirements of article 13(2), (3) and (4) or Article 14(2) and (3) of this Regulation.***

Cardboard coated with polyethylene is suitable for packing dry, water, acidic, alcoholic and fatty food products (up to a maximum of 10% fat content): 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 Polyethylene complies for use in articles that contact food except for articles used for packing or holding food during cooking Substances used in the coating do not contain any monomers or additives with the specific migration limit (SML).

- ***Regulation No 1935/2004 of the European Parliament and of the Council of 27th October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC***

Compliant when used in accordance with the intended use and product specification. The packages are manufactured in accordance with the principles of Good Manufacturing Practice and, under conditions of proper use, do not cause the migration of their ingredients to food in

amounts that could: - pose a threat to human health, - cause an unacceptable change in the composition of the food, - cause deterioration of their organoleptic characteristics.

- ***Commission Regulation 2023/2006 of 22 December 2006 on good manufacturing practise for materials and articles intended to come into contact with food (with amendments)***

Compliant when used in accordance with the intended use and product specification.

- ***BfR Recommendation XXXVI, Paper and board***

Coated paper meets the requirements of Recommendation BfR XXXVI.

### **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 packaging manufacturer, manufacture of cups has conducted voluntary migration testing for PE (polyethylene) coated paperboard cups to ensure the safety of the produced containers.

<b>Simulant</b>	<b>Test conditions</b>	<b>Result (mg/dm<sup>2</sup>)</b>	<b>Parameter compliant / non-compliant</b>
10% ethanol	2h in 70° C	2,3 (2,4; 2,2; 2,2)±1,2	Compliant
3% acetic acid	2h in 70° C	1,4 (1,5; 1,3; 1,4) ±1,3	Compliant
95% ethanol	4h in 60° C	3,0 (3,1; 2,8; 3,0) ±1,3	Compliant
iso-octane	0,5h in 40° C	2,5 (2,6; 2,4; 2,5) ±1,0	Compliant

Overall migration of the PE coated side of the paperboard has been tested by an independent, accredited laboratory in accordance with methods EN 1186-1:2005. Overall migration is below the 10 mg/dm<sup>2</sup> limit in all tested conditions mentioned in the table below. In the evaluation, it is assumed that 1 kg of food is in contact with 6 dm<sup>2</sup> of the PE coated side(s) of the paperboard.

### **Chemical dangers**

We hereby warrant that producer of raw materials 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 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.

- ***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.

- **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.
- **Fluorine**  
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.
- **Lanthanide**  
Test carried out by an accredited laboratory for the specific migration of elements (in accordance with Annex II to Commission Regulation (EU) No. 10/2011) in accordance with the standard PB-204 ed. VI of October 5, 2020. The result is consistent.
- **GMO**  
No GMO raw materials are used in the production process
- **Mineral oil (MOSH/MOAH)**  
The paper is made from fresh fibers and does not contain any prints from recycled materials. Mineral oils are not used as raw materials in the production of this product. All chemicals and additives used in production are approved for contact with food.
- **Formaldehyde**  
According to the paper manufacturer's declaration and analysis carried out in accordance with EN 1541, the amount of formaldehyde is <math>< 1.0 \text{ mg / dm}^2</math>.
- **Allergens**  
In accordance with Click-Pack's Allergen Policy and the US FDA Food Allergen Labeling and Consumer Protection Act (FALCPA) and Regulation (EU) No 1169/2011, Annex II as amended, food allergens or products derived therefrom are not intentionally added in the production of the product.
- **Antimicrobial substances**  
According to the declaration of the paper manufacturer and the analysis carried out in accordance with EN 1104, there is no transfer of antimicrobial ingredients.
- **Primary amines**  
The primary amine specific migration test is in accordance with ed. PB-413. II of 02.22.2021. The sum of the primary amines is  $\leq 0.0$
- **Dual use additives (DUA)**  
The used substances in coating do not contain any additives that are authorized as food additives by regulation (WE) No 19/2004 and No 10/2011.

### **Heavy metals**

The products meet the requirements of Directive 94/62 / EC, as amended, do not contain substances harmful and dangerous to the environment, and the total content of heavy metals Cd, Pb, Cr (VI) and Hg do not exceed 100 mg / kg. In addition, in accordance with the EU

Commission Regulation No. 10/2011, tests for the specific migration of heavy metals according to the standard PB-204, VI of 2020-10-05 are compliant.

### **Paints and lacquer used for printing**

- **Commission Regulation (EU) 2018/213 of 12 February 2018 on the use of bisphenol A in varnishes and coatings intended to come into contact with food and amending Regulation (EU) No 10/2011 as regards the use of that substance in plastic food contact materials.**

According to the tests carried out by an accredited laboratory and declarations of the manufacturer of paints and lacquers, the packaging complies with the requirements in force in the country and the EU.

- **Regulation No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).** Printing inks are used to prevent the transfer of substances to the side in contact with food, through the substrate or as a result of reflection in a pile, in amounts posing a health risk, which is inconsistent with art. 3 of Regulation (EC) 1935/2004.

- **EuPIA Guidelines (European Association of Printing Ink Manufacturers), EuPIA-Leitlinie.**

According to the declaration of the manufacturer of paints and varnishes, they are free from heavy metals, and the total total content of lead, mercury, chromium and cadmium is <100 ppm.

- **Resolution ResAP (2005)2 on printing inks used for printing on the outside of packages and articles intended for contact with food.**

Moreover, the manufacturer declares that the content of substances such as dioxins and their derivatives, polyvinyl chloride monomers, benzidine derivatives, isocyanates complies with the applicable legislation.

Phthalates, alkylphenols, acrylic acid, dimethyl fumarate are not used in the production of paints and varnishes.

### **Traceability**

Keeping a register of suppliers and recipients of raw materials as well as materials and products, appropriate marking of the production batch, production reporting and marking of packaging ensures full traceability of our product. The traceability of materials and products at all stages of the production, processing and distribution process is intended to facilitate the process of controlling the recall of defective products, providing information to consumers and the possibility of assigning responsibility.

### **Reach**

Based on information from our suppliers, we can confirm that none of our products contain substances on the SVHC Candidate List (including Annex XIV, Authorization) in a concentration above 0.1% (w / w). Substances of Very High Concern (SVHC) are not used in paints and lacquers.

### **Microbiology**

In accordance with the guidelines of Good Manufacturing Practice (GMP), our packaging and the production environment are controlled and tested by an Accredited Laboratory for the presence of pathogenic microflora. The test results are consistent, thus confirming the high level of production hygiene and ensuring the microbiological safety of the user.

### **Environment and recycling**

Manufacture reduces the amount and negative environmental impact of substances used in the production of packaging and the generated packaging waste, and in particular minimizes the volume and weight of packaging so that they fulfill their function, taking into account the user's expectations.

Manufacture confirms compliance with the Act of 13 June 2013 on the management of packaging and packaging waste (with amendments) and the Directive of the European Parliament and of the Council No. 94/62 / EC of 20 December 1994 on packaging and packaging waste (with amendments).

### **Application restrictions**

The product is not intended for serving food containing more than 10% fat. The product is not intended for defrosting and heating food (e.g. ready meals) in a microwave, conventional and traditional oven. The product can be used for alcohol, but contact is recommended up to 15 minutes due to the possible occurrence of soaking the paper. They have an indefinite shelf life, however, a storage (shelf life) of 18 months is recommended.

### **The storage conditions**

Paper packages should be stored in collective packages, in dry and sunless rooms, at a temperature of 15-35 ° C and humidity up to 65%.

### **Final provisions**

The ratio of food contact area to volume used to determine the conformity of material or article is different for different articles. Final verification of the suitability of the product mentioned in the declaration for the type of food used, which it will be filled, lies with the customer. According to point 15.3 of Commission Regulation (EU) No 10/2011 Declaration „shall be renewed when substantial changes in the composition or production occur that bring about changes in the migration from the materials or articles or when new scientific data becomes available”.

Prepared by: Kamile Kairyte

