



POS-2019-052

Conformity declaration

Manufacturer: DOPLA PAP, a.s.
Pod Svatoborem 41, 342 59 SUŠICE, ČR

1. We declare with this that products made from Bleached craft pulp coated with LDPE:

Cups PBT018 and PBT030

are conform with the following EU legislative:

- Regulation 1935/2004/CE
- Regulation 2023/2006 CE and following actualizations and changes.

With the following Italian legislative:

- D.M. 21/03/1973 and with following actualizations and changes
- DPR 777/82 and following actualizations and changes

With the following German legislative:

- BfR Recommendations on Food Contact Materials XXXVI Paper and board for food contact
- BfR Recommendations on Food Contact Materials XXXVI/2 Paper and Paperboard for Baking Purposes

With the following French legislation:

- Note d'information de la DGCCRF n° 2004-64 du Mai 2004

For realization of these products, there were used raw materials and auxiliary substances present in positive lists of valid legislatives which are in conformity with the requirements on composition and purity of materials destined for food contact for which are necessary migration tests and which further respect the specific limitation to which these may relate.

(Title II head IV, art. 27 paragraph 1., DM 21/03/1973 a BfR XXXVI)

The sum of the levels of lead, cadmium, mercury and hexavalent chromium is below 100 ppm.

REACH SVHC GP's manufacturing processes do not intentionally add or use, above 0.1%, Substances of Very High Concern (SVHC) listed as of January 15, 2019.

Dioxins as 2,3,7,8 TCDD: This product meets the requirements of not exceeding 2 parts per trillion dioxin levels (2,3,7,8 TCDD). In addition, the mills observe properly written Mill Specific Operation Procedures, MSSOP, as agreed upon with the FDA.

EU Food Contact Statement for LDPE

The LDPE used complies with food contact applications under EU Regulation 10/2011. The monomers used to produce the LDPE are listed in the Annex I of Regulation 10/2011 with no restrictions. According to the manufacturer the LDPE does not contain chemicals subject to SML restrictions, including the dual additives requirements as defined under EU Directive 2004/19/EC. The LDPE is produced with raw materials and operating practices that would not endanger human health, create an unacceptable change in the composition of the food, or create deterioration in the organoleptic characteristics thereof within the meaning of the Good Manufacturing Practice regulations under the Framework Directive 1935/2004 and Commission Regulation 2023/2006.

Migration Test according to EU Reg. 10/2011, Chapter 2, Section 2, Article 12.

The polycoated bleached board was tested and passed the migration test using Acetic Acid at 3% and Ethanol at 50%. The samples were below the Overall Migration Limit of 10 mg to total constituents released per dm² of food contact surface.

Compliance with US Food & Drug Administration Statement unacceptable change in the composition of the food, or create deterioration in the organoleptic characteristics thereof within the meaning of the Good Manufacturing Practice regulations under the Framework Directive 1935/2004 and Commission Regulation 2023/2006.

Migration Test according to EU Reg. 10/2011, Chapter 2, Section 2, Article 12.

The polycoated bleached board was tested and passed the migration test using Acetic Acid at 3% and Ethanol at 50%. The samples were below the Overall Migration Limit of 10 mg to total constituents released per dm² of food contact surface.

Compliance with US Food & Drug Administration Statement

The product listed above in "Article Denomination" meets the requirements of 21 CFR 176.170 and 21 CFR 176.180.

Also, the polycoating meets the requirements set forth under 21 CFR § 177.1520(a)(2)(i) and complies with extractive limitations set forth in paragraph (c) 2.1, 2.2 thereunder, the polycoating may be used in complying with food contact applications defined by Parts 175, 176, and 177.

Italian Ministerial Decree of 21/03/1973: The above mentions product supplied to you is compliant with Italian Ministerial Decree of 21/03/1973 and subsequent updates and amendments.

Italian Presidential Decree 777/82: The above-mentioned product supplied to you is compliant with Italian Presidential Decree 777/82 and subsequent updates and amendments.

RoHS, RoHS2 and RoHS3: The above-mentioned product(s) meets European directives, 2002/95/EC, 2011/65/EU and 2015/863/EU, as well as the Chinese RoHS standards. The following assurance is for the ten RoHS compounds: Lead compounds, Mercury, Cadmium, Hexavalent Chromium, Polybrominated biphenyl (PBB), Polybrominated diphenyl ether (PBDE) including penta and octa PDE, Bis(2Ethylhexyl) phthalate (DEHP), Benzyl butyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP).

Our investigations indicate the heavy metals, as well as PBB, PBDE, DEHP, BBP, DBP and DIBP, are not intentionally added nor used in the manufacturing of the bleached board and polycoated bleached board, nor do we have any indication they could be present in any material that may become part of the final product.

No materials or substances that would render these articles "active" or "intelligent" has been added intentionally or are present.

2. Above mentioned products are manufactured from:

- Bleached craft pulp ECF quality (hardwood and softwood, 100% Virgin Fiber), approved for food contact
- Bleached board and low-density polyethylene (LDPE) made and delivered by Georgia Pacific company.

3. This declaration was elaborated in conformity with above named legislative and is destined for: IGEFA

4. Food contact conditions:

- cups can be in contact with all types of drinks
- beverage temperature up to 90 ° C for 15 minutes
- suitable contact for frozen food and ice cream

Not suitable for use with conventional ovens or microwave ovens or for preservation!

The cups must be stored dry and at room temperature. After use, place in sorted waste in paper.

5. All polymers and barriers used as primary raw material are listed in the above standards and regulations and are based on written confirmation from our suppliers.
This statement is issued in conformity with the above-mentioned legislation. The basis is a Declaration of compliance GP and test reports Masterserve™ Sample Grade CPC143, Masterserve™ Sample Grade HCC180, Masterserve™ Sample Grade HCC1802E35 - Statement and Test Results.

6. This declaration is valid from below given date and will be replaced in the case that it will be substantially changed the used material which may cause mutation of some basic requirements concerning the migration or/and if the named legislative in this declaration will be changed or actualized in so a manner that it will demand the new checking of the conformity declaration. In any case, the validity of this declaration is time limited to 12 months.

Sušice 24.9.2019



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Iveta Kůsová
Quality Manager

