



White color paper straws Declaration of Compliance

Hereby we confirm that our product:

White color paper drinking straws:

Comply with Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food as well as with the requirements in BfR Recommendation XXXVI on paper and board articles intended to come into contact with food.

Comply with the requirements in FDA 21 CFR 176.170.

Comply with GB 4806.1-2016, General safety requirements for food contact materials and articles and GB 31603, National Food Safety Standard General Hygienic Practice for Production of Food Contact Materials and Its Products.

Comply with GB 9685-2016, Standard on use of additives in food contact materials and articles, including list of restricted substances and with the requirements in GB 31604.8-2016.

Comply with Indian IS6615.

Comply with Turkish Law No. 5996 on veterinary services, plant health, food and feed.

Comply with the Decreto Ministeriale del 21/03/1973 as subsequently amended and Supplemented. Comply with DPR 777/82 and subsequent modifications.

Comply with French regulations in force concerning materials and objects in contact with food, namely Decree No. 2007-766 of 10 May 2007, amended by Decrees No. 2008-1469 of 30 December 2008 - No. 2011-385 of 11 April 2011.

Comply with Fiche MCDA n°4 (V02 – 01/01/2019) - Aptitude au contact alimentaire des matériaux organiques à base de fibres végétales destinés à entrer en contact avec des denrées alimentaires as well as French law n° 2012-1442.

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

Comply with the (Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code – LFGB) §§ 30 and 31) and amendments.

We also confirm that POPs are not being part of our products and our products comply with Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants.

The raw materials used comply with Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to



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

Paper straws raw materials	Virgin paper grade (FSC certified) + water-based dispersion adhesive
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- Paper grade raw material:

For the purpose to achieve high chemical and microbiological purity, only virgin high-quality FSC-certified paper used in the production of our products.

Moreover, the paper grade used is in compliance with the (Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code – LFGB) in the version of the notification of 3 June 2013, (BGBl. P. 1426), last amendment by article 1 of the act of 30 June 2017 (BGBl. I p. 2147), §§ 30 and 31).

BfR Recommendation XXXVI

Complies with BfR Recommendation XXXVI. Paper and board for food contact, recasted by 62nd Announcement, Bundesgesundheitsblatt 14 (1971) 83, last amended by 222nd Announcement Bundesgesundheitsblatt 62 (2019) 1546, as of 1 June 2019).

Decreto Ministeriale 21 marzo 1973

Furthermore, the paper grade meets the analytical demands of the Decreto Ministeriale 21 marzo 1973, Gazzetta Ufficiale della Repubblica Italiana, 20.4.1973, last modification of 31 May 2016.

Decree no. 92-631 of 8 July 1992

Complies with the rules of the (Decree no. 92-631 of 8 July 1992 on materials and articles intended for contact with foodstuffs, products and drinks for men’s or animals’ food, state of 20 January 1994),

Decree no. 2007-766 of 10 May 2007

Complies with (Decree no. 2007-766 of 10 May 2007 regarding the application of the consumer law, which concerns materials and articles intended for food contact, last amendment by decree no. 2011-385 of 14 April 2011, supersedes Decree no. 92-631 of 8 July 1992 on materials and articles intended for contact with foodstuffs, products and drinks for men’s or animals’ food).

Netherland’s Warenwet

Complies with Netherland’s Warenwet of 14.03.2014 for food contact materials.



China GB9685-2016 & GB 4806.8

Complies with GB9685-2016 Standard on use of additives in food contact materials and articles, including list of restricted (e.g. SML) substances and GB 4806.8 National Food Safety Standard-Food Contact Paper and Board Materials and Their Products.

(EU) 528/2012

Complies with European Biocides-Regulation (EU) No 528/2012.

FDA (USA)

Furthermore, the paper grade is in compliance with the demands of the Code of Federal Regulations, Food and Drugs (FDA), 21 CFR Ch. I (1 April 2018 edition), §§ 176.170 and 176.180.

- Water based dispersion adhesive:

(EU) No 10/2011

The adhesive used complies with (EU) No 10/2011 on plastic materials and articles intended to come into contact with food and its last amendment Regulation (EU) 2020/1245.

Decreto Ministeriale 21 marzo 1973

The adhesive is in compliance with the General requirements and Positive list in Annex II, Section 3, Part D of the Italian Ministerial decree 21/03/1973 (DM 21/03/73 e smi) and amendments.

Epoxy Regulation

The adhesive does not contain any epoxy derivatives as part of its formulation, i.e. BADGE and its derivatives, NOGE and BFDGE as mentioned in the European Regulation (EC) No 1895/2005.

BfR (Germany)

The components of the adhesive comply with the XIV. BfR recommendation for direct food contact.

FDA (USA)

The adhesive is in compositional compliance with the Indirect Food Additives regulation 21 CFR 175.105 'Adhesives' and meets the compositional requirements of 21 CFR 176.170 'Components of paper and paperboard in contact with aqueous and fatty foods'.

China GB 9685-2016

The adhesive is in compliance with GB 9685-2016, Standard on use of additives in food contact materials and articles, including list of restricted (e.g. SML) substances.



Packaging waste, TPCH

The heavy metal cadmium, lead, mercury and chromium^{VI} are not intentionally used in the manufacture of our straws. The sum of heavy metals cadmium, lead, mercury and chromium^{VI} incidentally present is below 100ppm. Therefore, our straws comply with the Directive 94/62/EC as amended, as well as the limit of US Model Toxics in Packaging Legislation by Toxics in Packaging Clearinghouse (TPCH), established by the Coalition of Northeastern Governors (CONEG).

CALIFORNIA PROPOSITION 65

We hereby confirm that our products do not contain any chemicals known to the State of California to cause cancer, birth defects or other forms of reproductive harm.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) are not intentionally added in the production of our product.

BSE

Our straws are manufactured without any derivatives of animal origin. There is no scientific reason to assume any risk of BSE transfer through them.

Allergens

Straws are manufactured without the intentional use of substances currently known to be or suspected of being food allergens. Furthermore, they are manufactured without the use of ingredients listed in Annex III LMKV.

Substances currently known as or suspected to be food allergens (listed in Annex II of Reg. (EU) No 1169/2011) are not being part of the raw materials used in their production, not used or intentionally added in their production process, not present in our factory and therefore, contamination from the processing equipment is also excluded.

Gluten

We confirm that our products are gluten free.

The raw materials (blend of poly-resins) used in their production are gluten free, are not obtained from mixtures of cereals containing gluten (ex wheat) and that, therefore no gluten is contained in any of our finished products.

No gluten containing materials are being handled at our facilities and therefore no potential for contamination of finished products exists.

SUBSTANCES WITH RESTRICTION, DUAL USE ADDITIVES - ADDITIVES CHEMICALLY IDENTICAL WITH A FOOD ADDITIVE OR FLAVOURING:

FCM no.	CAS no.	Name	SML / Limitation	DUAL USE /additive Chemically identical with a food additive or flavouring	NIAS / BY - PRODUCTS
21	-	Carbonic acid (as	-	YES	

		sodium salt, E 500)			
252	110-44-1	Sorbic Acid (E 200)	-	YES	
115	64-19-7	Acetic acid (as sodium salt, E 262)	-	YES	
128	75-07-0	Acetaldehyde	6 mg/kg	NO	YES
98	50-00-0	Formaldehyde	15 mg/kg / 1 mg/dm ² (BfR XXXVI)	NO	YES
451	2682-20-4	2-Methyl-4-isothiazolin-3-one	SML = 0.5 mg/kg / 80 µg/dm ² (BfR XXXVI)	NO	
-	26172-55-4	5-Chloro-2-methyl-4-isothiazolin-3-one	max 0.003 mg/dm ² in dispersion film / 25 µg/dm ² (BfR XXXVI)	NO	
-	2634-33-5	1,2-Benzisothiazolin-3-one	SML = 0.5 mg/kg / 80 µg/dm ² (BfR XXXVI)	NO	
-	52-51-7	2-Brom-2-Nitro-Propandiol (1,3)	max. 0,032 mg/dm ² of the dispersion film	NO	
231	108-05-4	Acetic acid, vinyl ester	SML = 12 mg/kg	NO	

Food legislation restrictions on substances with E in the above table have been considered. The SML / Limitations of substances in the table above are not exceeded based on cold water extraction analysis / migration analysis / are covered by the worst-case calculation and are not exceeded under the conditions of use, therefore, a specific monitoring is not required.

RISK MANAGEMENT

All raw materials used in the manufacture of our paper straws have been evaluated and the risk assessment for finished product food contact suitability has been carried out in accordance with the applicable legal provisions and CEPI food contact guidelines 2019.

Recycled paper is not used in the production of our paper straws and therefore there is less risk of non-intentionally added substances (NIAS) such as traces of printing inks or mineral oils.

We also declare that substances such as phthalates, BPA, Bisphenols F and S, Bisphenol derivatives, glycol ethers, PVC-PVDC, Primary Aromatic Amines, Alkylphenols, APEO's, NPEO's, or any other endocrine disrupting chemicals, Fluorosurfactants, PFAS, PFOA/ PFOS, PBBs, PCB's, PAHs, PBDE's, photoinitiators, benzophenones, benzoates, 1-hydroxycycloheptylketone, 2-ethylanthraquinone, isopropylthioxanthone, 2-ethylhexyl-4-(dimethylamino)benzoate (EHDAB), ethyl-4-(diethylamino)benzoate (EDAB, are not being a part of the production of our products and the raw materials used do not contain any substance than can degrade into or be capable of releasing any of the above-mentioned restricted substances ensuring paper straws' compliance with European Framework Regulation (EC) no 1935/2004.



Furthermore, we declare the following for our paper straws:

The concentration of Cadmium (Cd) is < 0.002 mg/dm², the concentration of Lead (Pb) is < 0.003 mg/dm², the concentration of Mercury (Hg) is < 0.002 mg/dm² and the concentration of Pentachlorophenol (PCP) is < 0.1 mg/kg.

NIAS SCREENING ANALYSIS

The results of the screening analysis for not intentionally added substances (NIAS) gave no indication for any objections.

REACH REGULATION (EC) 1907/2006

To our knowledge and based on the information from our suppliers we can confirm that our products do not contain:

- Substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration above 0.1%
- Substances included in Annex XVII

MIGRATION REPORT 1

TYPE OF ANALYSIS	CONCLUSION	REGULATION OR PROTOCOL
Cold water extraction analysis	Pass	BfR XXXVI
Content analysis	Pass	BfR XXXVI, Directive 94/62 EC
Sensory analysis	Pass	Regulation (EC) No 1935/2004 article 3
Inhibition test	Pass	BfR XXXVI
Fastness of Optical brighteners	Pass	BfR XXXVI
Specific migration	Pass	(EU) No 10/2011 and HAVI food contact Requirements
Specific migration of mineral oils	Pass	German mineral oil ordinance
Screening of NIAS	No objections	Regulation (EC) No 1935/2004 article 3c.

EXTRACTION ANALYSIS (FDA TEST REPORT)

TEST REQUESTED	RESULT
176.170 extractives in 50% alcohol	Pass
176.170 extractives in 8% alcohol	Pass
176.170 extractives in n-heptane	Pass
176.170 extractives in water	Pass

GB 4806.8-2016 MIGRATION REPORT

TEST	LIMIT	RESULT
overall migration into 4% acetic acid (3 hours / 70° C)	10 mg/dm ²	PASS
overall migration into 50% Ethanol (3 hours / 70° C)	10 mg/dm ²	PASS

FRENCH DGCCRF TEST REPORT

TYPE OF ANALYSIS	CONCLUSION
Specific migration of Metals	Pass
Specific migration of Photoinitiators	Pass
Specific migration of Phthalates	Pass
Specific migration of PAHs	Pass
Content analysis of Bisphenol A	Pass
Specific migration of PFOA	Pass

DM 21.3.73 TEST REPORT

TYPE OF ANALYSIS	CONCLUSION
Fibrous Materials content	Pass
Fillers content	Pass
Auxiliary substances determination	Pass
Polychlorobiphenyls content	Pass
Nitrogen substances determination	Pass
Specific migration of formaldehyde	Pass

Moisture, ashes, starches, rosins and derivatives testing has also been conducted.

IS 6615 TEST REPORT

TEST	LIMIT	RESULT
Cadmium	0,5 mg/kg	PASS
Chromium	0,1 mg/kg	PASS
Mercury	0,3 mg/kg	PASS
Lead	3 mg/kg	PASS
Polychlorinated biphenyls (PCBs)	2 mg/kg	PASS
Pentachlorophenol (PCP)	0,05 mg/kg	PASS

Full details based on the testing and direct comparison with limit values are available upon request.



Specification of the intended use or limitations:

- Type(s) of food intended to come into contact with the product:
 - o All aqueous, acidic and alcoholic foods and milk products
- Duration and temperature of treatment and storage while in contact with the food:
 - o Up to 40°C tested
 - o Up to 3 hours
- Ratio of the area of food contact material to the volume used to determine the compliance of the food contact material or article:
 - o mg/kg: for the EU-convention of 6 dm² packaging for 1 kg food
- Storage:
 - o Storage conditions: from 0° C up to 45°C, protect against moisture.
- Shelf life:
 - o 18 months (recommended)
 - o Under FDA: The product has been tested under conditions of use D through E as described in table 2 of CFR 21 §176.170(c) and may be used in contact with the food types I., II., III., IVA., IVB., VI-A, VI-B and VI-C as described in table 1 of CFR 21 §176.170(c).
 - o Product use: at temperatures up to 104°F.

Traceability of the product is ensured according to Regulation (EC) No 1935/2004 via the number of the production lot and the date of production displayed in the production carton.

Athens, 23/03/2023

Place/date

MATRIX PACK S.A.
2, ADRIANEIOU STR., 11525 ATHENS
VAT EL 998323762
TEL.: +30210 6985350, FAX: +30210 6981509

Signature

Expires 3 years after date of issue