DECLARATION OF CONFORMITY TO THE REGULATIONS RELATING TO MATERIALS AND OBJECTS IN CONTACT WITH ALIMENTAIRES1 FOODSTUFFS

1. Identity of the declaring operator:

Name: BELLO Céline
Function: Quality Manager
Name and address of the Company: ALUPLAST / Z.A.C de la prévôté - 9 Route de BU - 78550 HOUDAN France

2. Identity of the material and/or object being declared:

Declares that the material and/or object referenced to the customer in the following way:

DESIGNATION		REFERENCE
WHITE PAPER CUP		**GOB 17 IND**

Indicate the components of the material(s) that make up the structure of the object:

Material Family	Aluminium	Wood	Paper/carton	Plastic
			X	

Characteristic components, from the inside out: **Cardboard + thin layer of polyethylene (PE) (layer on the inside).**

Issue date: 31/08/2022

3. Confirmation of the conformity of the material and/or object that is the subject of the declaration:

Manufactured in accordance with the following regulations:

- Regulation (EC) No. 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with foodstuffs;
- Regulation (EU) No 2023/2006 of 22 December 2006, as amended, on good manufacturing practice for materials and articles intended to come into contact with foodstuffs;
- Commission Regulation (EU) No 10/2011 of 14 January 2011 and its amendments for plastics.
- MCDA Fact Sheet n°4 (V02 – 01/01/2019) - Suitability for food contact of organic materials based on plant fibers intended to come into contact with foodstuffs
- Law No. 2012-1442 of 24 December 2012 on the suspension of the manufacture, import, export and marketing of all food packaging containing bisphenol A (1)

This declaration of conformity has been drawn up on the basis of the following elements :

☐ Declarations from suppliers of raw materials (component of the material/object)
☐ Manufacturing Plant Declarations
☑ Global migration analysis (if applicable)

Notes:

a) mg/kg = milligram per kilogram)
b) mg/dm 2 = milligram per square decimeter
c) °C = degree Celsius
d) MDL = Limit of Detection Method
e) ND = Not Detected (<MDL)

4. Global Migration Analytics:

EN1186 conditions and Regulation 10/2011 EC

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Items meet the requirements of global migration limits

Simulants	Method	Time	Temperature	Results	Conclusion
B: Acetic acid 3%	1186-9 Filling (A)	2 hours	70°C	2mg/dm²	Pass
D1 : Ethanol 50%	1186-9 Filling (A)	2 hours	70°C	2mg/dm²	

The analytical tolerance of aqueous simulant is 2mg/dm² or 12 mg/kg
The analytical tolerance of simulating fatty food is 3mg/dm² or 20mg/kg

Standard conditions (test times and temperatures) corresponding to the input data
The duration and temperature of contact with foodstuffs correspond to the following global migration test conditions : MG3 Tested Products

MG1	10 days at 20 °C	All contact in the frozen and refrigerated state.
MG2	10 days at 40 °C	Any long-term storage at room temperature or below, including heating at a maximum of 70°C for up to hours or heating at a maximum of 100°C for up to 15 minutes.
MG3	2 hrs at 70°C	Any condition that includes heating at a maximum of 70°C for up to 2 hours or heating at a maximum of 100°C for up to 15 minutes, not followed by long-term storage at room temperature or in a refrigerated state.
MG4	1 h at 100°C	High temperature applications for all simulating at a maximum temperature of 100°C.
MG5	i.e. 2 h at 100 °C or the temperature of reflux, i.e. 1 h at 121 °C	High temperature applications at a maximum temperature of 121°C

5. Specific migration of phthalates:

EN 13130-1 (1 test \ 1 simulant)
Dosage GC/MS

Substances	CAS n°	Test Condition	Simulant Volume	Surface	Results	Conclusion
DBP (Dibutyl phthalate)	84-74-2	Isooctane 40 °C 30 minutes	250 ml	1.8 dm²	<0.1 mg/kg	Pass
BBP (Butylbenzyl phthalate)	85-68-7				<0.1 mg/kg	Pass
DEHP (Di(2-ethylhexyl) phthalate)	117-81-7				<0.1 mg/kg	Pass
DINP (Di-iso-nonyl phthalate) +DIDP(Diisodecyl phthalate))	-				<0.8 mg/kg	Pass
DAP (Diallyll phthalate)	131-17-9				<0.01 mg/kg	Pass

6. Specific migration of primary aromatic amines

EN 13130-1 (1 test \ 1 simulant) + Visible UV spectro - Regulation 10/2011 EC

Test Condition	Simulant Volume	Surface	Limits mg/kg	Migration and AAP mg/kg	Conclusion
3% Acetic Acid 70 °C/ 2 hours	250 ml	1.8 dm²	<0.002	<0.001	Pass

7. Specific migrations of the 19 metals in plasticized materials in contact with foodstuffs

EN13130-1: (1 trial \ 1 simulant); analysis was performed by ICP-MS

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Substances	Simulant Volume	Surface	Conditions	Limits mg/kg	Results
Chromium (Cr)	250 ml	1.8 dm²	2h 70°C Acetic Acid 3%		<0.01
Arsenic (As)					<0.005
Cadmium (Cd)					<0.002
Mercury (Hg)					<0.005
Lead (Pb)					<0.005
Lithium (Li)				<0.6	<0.025
Aluminum (Al)				<1	<0.25
Manganese (Mn)				<0.6	<0.025
Iron (Fe)				<48	<0.25
Cobalt (Co)				<0.05	<0.025
Nickel (Ni)				<0.02	<0.0125
Copper (Cu)				<5	<0.25
Zinc (Zn)				<5	<0.25
Antimony (Sb)					<0.025
Barium (Ba)				<1	<0.25
Lanthanum (La)					<0.025
Europium (Eu)					<0.025
Gadolinium (Gd)					<0.025
Terbium (Tb)					<0.025
Conclusion				Pass	

8. Bisphenol A content:

French Law 2012-1442 of 24 December 2012, to determine bisphenol A.
Test method: Acetonitrile extraction 24h 23°C / LC-MS-MS analyses.

	CASE NO.	Test Method	Results	Conclusion
Bisphenol A	80-05-7	Acetonitrile Extraction 24h/ 23°C	<100µg/kg	Pass

#Conforme: No values for BPA in materials above the DGCCRF guideline of 2 mg/kg or 2000µg/kg have been quantified

9. Dye determination: from fastness to disgorging with 2 simulants

According to : EN 646

Test	Permissible Limits	Results
Method with Acetic Acid Simulant 3%		B "average" ambient duration
Olive Oil Simulant Method		D "short" hot duration
Duration with Acetic Acid Simulant 3%		4h 23+/-2°C
Duration with olive oil simulant		30 minutes 120+/-3°C
Disgorging with Acetic Acid Simulant 3%	>5	5.0
Disgorging with olive oil simulant	>5	5.0
Conclusion	Pass	

10. Extractable metals:

Test Method: With reference to EN645 or EN 647 /Derivatives of EN 12497(hg) +EN 12498(pb)

Parameter	Limits	Results	Conclusion
Mercure extractible / Mercury (Hg)	<0.01 mg/kg	<0.01 mg/kg	Pass
Plomb extractible / Lead (Pb)	< 0.003 mg/kg	< 0.003 mg/kg	Pass

11. Pentachlorophenol PCP Content:

- ISO 15320- ISO 17070

	CASE	Limits	Results	Conclusion
CFP	87-86-5	<0.1 mg/kg	<0.1 mg/kg	Pass

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12. Determination of transfer of antimicrobial constituents:

Test Method: With reference to EN1104

	Result	Conclusion
Bacillus subtilis strain inhibition zone	Absence	Pass
Aspergillus niger strain inhibition zone	Absence	Pass

13. 5 extractables PAH (polycyclic aromatic hydrocarbures) B(a)A*CHR*B(b+j)F-B(a)P

According to :DGCCRF sheet plant materials- EN 1559 extraction (2h60°C Ethanol 95%)- Dosing by GC-MS.

	Conditions	Limits	Results on cardboard alone
Benzo(a)anthracene	2h 60°C Ethanol 95%	<0.001 mg/kg	<0.001 mg/kg
Chrysene		<0.001 mg/kg	<0.001 mg/kg
Benzo(b)fluoranthene + Benzo(j)fluoranthene		<0.001 mg/kg	<0.001 mg/kg
Benzo (at) pyrene		<0.001 mg/kg	<0.001 mg/kg
Sum		<0.001 mg/kg	<0.001 mg/kg
Conclusion		Pass	

14. Extractable photoinitiator and cross-linker contents:

According to :DGCCRF sheet plant materials - EN 1559 extraction (2h 60°C Ethanol 95%)- Dosing by GC-MS

		Conditions	Limits	Results
Benzophenone content	116-61-9	2h 60°C Ethanol 95%		<0.1 mg/kg
4-methylbenzophenone content	134-84-9			<0.2 mg/kg
4-hydroxybenzophenone content	1137-42-4			<0.2 mg/kg
Sum of benzophenones			<0.6 mg/kg	<0.6 mg/kg
Content of 1-hydroxycyclohexyl(phenyl)ketone	947-19-3		<0.01 mg/kg	<0.01 mg/kg
2-ethylanthraquinone content	84-51-5		<0.01 mg/kg	<0.01 mg/kg
Content of 2-ethylhexyl-4(dimethylamino)benzoate	21245-02-3		<2.4 mg/kg	<2.4 mg/kg
Rthyl 4-4(dimethylamino)benzoate content	10287-53-3		<0.05 mg/kg	<0.05 mg/kg
Isopropylthioxanthone content	5495-84-1		<0.05 mg/kg	<0.05 mg/kg
Conclusion			Pass	

15. Organoleptic inertia: Robinson's test:

According to : derived EN 1230-2 (48h20 °C 75%) humidity with grated milk chocolate) + Organic-Plant Fiber Material Data Sheet

	Limits	Results	Conclusion
Median	<2	0.0	Pass

The sample is considered satisfactory if the average score does not exceed 2
Test carried out according to the analysis method of the International Cocoa and Chocolate Board.

a. PRINCIPLE

The sample to be examined and grated milk chocolate are placed in a closed glass container, protected from light, at a temperature of 20°C and an atmosphere of 75% relative humidity.
After 48 hours, the chocolate is tasted and its taste compared to that of chocolate from a blank test.

b. INTERPRETATION

The assessment relates solely to the discernment of a possible incidental taste. The strength of the taste is evaluated in relation to the blank test according to the following scale:

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0: no noticeable foreign taste
1: Barely noticeable foreign taste
2: Slight foreign taste definable
3: Strong foreign taste
4: strong foreign taste

16. Information about the end use of the material or object:

Material or object intended for infant feeding ☐ Yes ☑ No

Type of food intended to be brought into contact:

	YES	NO
All types of food	X	
Where:		
Hydrophilic foodstuffs (physical contact/watery wetting)		
Dry and non-fatty foodstuffs (including acidic, alcoholic and frozen foodstuffs)		
Fatty foods (physical contact with fatty foods)		
If the material and/or object subject to Regulation (EU) No. 10/2011 is affected by the application of a reduction factor, mention it ☐ Fat Reduction Factor (FRTMG) ☐ Simulant D2 Reduction Factor		

Terms of Use:

The products mentioned are products to be in contact with beverages.
Suitable for contact with all foods for which simulants are intended.
The duration and temperature of contact with foodstuffs correspond to the conditions of the MG3 global migration tests.

Commission Regulation (EU) No 10/2011 of 14 January 2011 and its amendments for plastics.

Tableau 2

Affectation spécifique des simulants aux catégories de denrées alimentaires

(1)	(2)	(3)					
Numéro de référence	Description des denrées alimentaires	Simulants					
		A	B	C	D1	D2	E
01	**Boissons**						
01.01	Boissons non alcoolisées ou boissons alcoolisées titrant au maximum 6 % vol.:						
	A. Boissons transparentes:		X(*)	X			
	Eau, cidres, jus de fruits ou de légumes transparents simples ou concentrés, nectars de fruits, limonades, sirops, bitter, infusions, café, thé, bières, boissons gazeuses, boissons énergétiques et autres, eau aromatisée, extrait de café liquide						
	B. Boissons troubles:		X(*)		X		
	Jus, nectars et boissons gazeuses contenant de la pulpe de fruit, moûts contenant de la pulpe de fruit, chocolat liquide						
01.02	Boissons alcoolisées titrant 6 à 20 % vol.			X			
01.03	Boissons alcoolisées titrant plus de 20 % vol. et toutes les liqueurs à base de crème				X		
01.04	Divers: alcool éthylique non dénaturé		X(*)			Remplacer par de l'éthanol à 95 %	

17. Terms of use and storage :

- Store in a dry place, away from moisture and light, clean and well ventilated, free from direct sunlight and heat, away from all sources of products that could spoil the product.

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- The products mentioned are products for containing and consuming beverages.
- These products are not meant to be in contact with beverage for extended periods of time.

18. Recoverability:

The cardboard material is recoverable/recyclable:

- By recycling the material (EN 13430 standard). Sorted and emptied cardboard products are recyclable and must be placed and emptied in the corresponding sorting bins. If you are eating at home, you can sort your cardboard product in the bin that holds the paper and cardboard packaging. If you consume on the street or in a public place, sort it in the available sorting bins
- In the form of energy recovery (EN 13431 standard): Packaging composed of more than 50% (by weight) of organic materials, provides heat gain and must be considered as energy-recoverable.
- The Triman logo (Anti-Waste Law for a Circular Economy: AGEC)  on the bags and boxes indicates that the product can be recycled according to the instructions of your city and/or department. The products must be placed emptied (without food or waste) in the corresponding sorting bins and follow the sorting instructions of your city or department.

19. Traceability of information :

As required by Regulation (EC) 1935/2004, Article 17, Aluplast's supplier has put in place the necessary systems, records and procedures to ensure the traceability of the items.

20. REACH Compliance :

Regarding the REACH regulation, which came into force on 1 June 2007, our manufacturing plant is a user of raw materials and consequently, the pre-registration and/or registration of chemical substances is deployed by its raw material suppliers.
Regarding the very dangerous substances (classified SVHC in particular) present in the latest list in force, the products are not concerned since the factory does not use them or is very well below the limit (< 1000 ppm), the products being intended for food contact.

The declaration is based on the documentation of the raw material suppliers and/or the finished product manufacturer .
This declaration is valid only for the material or object as delivered (empty packaging), and as long as there is no regulatory change or change that could result in a change in the inertia of the material or article.
In any case, compliance is understood subject to compliance with the conditions of storage, handling and use taking into account the particular characteristics of the material or object, conditions as provided for by customs or professional codes.
In the event of a change in the characteristics of the packaged product, its composition or its intended use, as well as in the event of a change in the conditions of use of the material or object, the person to whom this declaration is addressed must ensure the compatibility of the container/content, for which he or she is then solely responsible.

However, the warranty cannot be extended to:

- Any subsequent changes in the composition of the product covered by this declaration, by the addition of substances of any kind;
- Processing that may lead to a denatured material;
- Incorrect use of materials;
- Verification of the reciprocal compatibility of the material and the packaged foodstuffs, which is the sole responsibility of the packaging user packaging the packaged foodstuffs with regard to its industrial process and the composition of these foodstuffs, and in particular the non-modification of the organoleptic characteristics of the packaged foodstuffs.
- The use of the products covered by this declaration is subject to verification of their conformity with the standards in force and their technical conformity with respect to the use for which they are intended.

This declaration takes effect from the date indicated, for a maximum period of 5 years. It cancels any previous declarations.
This declaration remains valid as long as the material or object referenced has not been subject to a change that may affect its suitability for food contact.

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Any change in the subject matter and/or regulations in force regarding this statement will result in its revision.
We are only liable for this statement to the extent that our suppliers' declarations are compliant.
This declaration is made pursuant to Article 16 of Regulation 1935/2004/EC, as well as Decree No. 2008/1469 of 30/12/2008 amending Decree No. 2007-766 implementing the Consumer Code with regard to materials and objects intended to come into contact with foodstuffs.

It is intended for the company: **E. Weber & Cie AG** Date : 1/8/2024

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