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# CUP

## THE MARKET

### PRODUCTS

Date: 21/08/2020

## DECLARATION OF CONFORMITY

<b>Trade name</b>	Cup The Market Ltd
<b>Product description</b>	Paper straw made of white kraft paper and glue (custom design will be with ink on surface).
<b>Paper</b>	Sweden/German food contact paper.
<b>Grammage</b>	Three layers paper each in 120g/ m <sup>2</sup> , 120g/ m <sup>2</sup> , 60g/ m <sup>2</sup> .  
<b>Ink</b>	Flint water-based contact ink. 
<b>Glue</b>	Henkel food contact glue. 
<b>Fiber source</b>	Virgin fiber bleached or unbleached from controlled wood, FSC managed forests.
<b>Bleaching</b>	
<b>Manufacturer name</b>	Cup The Market Ltd
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<b>Acting in position as</b>	Director
<b>Production Site</b>	Standard industrial city, Wuyan Street, Haiyan County, Jianxing City, Zhejiang province, China.

Date: 21/08/2020

Signature: 



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### a. Typical applications

The paper straw's intended use is for:

- Carbonated drinks, milk, alcoholic beverages, coffee, juice, water, soft drinks.
- All beverages in temperatures between 2°C and 80°C.
- The paper straw remains entirely functional for a minimum of 2 hours.

The quality of the paper straw is guaranteed as long as the paper is stored correctly; kept indoor in an average temperature, not higher than 25 degrees and stored in its original package. The straws are not considered a plastic according to the definition of 'Plastic' in the Single Use Plastics Directive (EU) 2019/904.

### b. Food contact compliance

We confirm that our PAPER STRAW range is manufactured in compliance with the current following regulations regarding substance and materials intended to be used in contact with food:

- 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.
- LFGB articles 30 & 31 and BfR recommendation.
- USA: FDA approved 21 CFR 176.170
- Germany: BFR Limited request on chloropropanol
- Germany: MOSH/MOAH free
- France: BPA Free
- Global standard for packaging and packaging materials: BRCC
- China: GB4806.1 and GB 4806.8; National Standards for food safety regulations.
- Dutch Commodities Act Regulation for packaging and consumer articles (Dutch Warenwetregeling Verpakkingen en gebruiksartikelen 2.2.1 Bijlage Deel A, Hoofdstuk 0 & Hoofdstuk II )
- Packaging Waste directive 94/62/EC and amendments



### c. Storage and handling recommendations

In order to guarantee the product's quality, it must be stored in a dry closed space. The environment's temperature should be under 25°C, the optimal storage humidity levels between 40% and 60%.

When relative humidity exceeds 70%, the product's propensity to be mouldy increases, thus it is recommended that the goods stay in their original package/carton and be packed by film wrapped on cartons.

Considering these good practices, paper straws can be used up to 1 months after manufacturing.

### d. Disposal and recovery

The paper straw range is suitable for recovery by:

- Material recycling according to EN 13430
- Energy recovery according to EN 13431
- Waste recycling: compostable according to EN13432

Degradable demonstration: BPI passed, samples are testing by DN, German laboratories, First state has been passed.

- The product contains no heavy metals.
- The product contains no fluorine.
- The product contains no IR.
- The product contains no ash

#### e. Purity and Migration tests

Fluorescent whitening agents: analysis was made through UV irradiation.

Testing conditions: Procedure B- Medium time contact: 4h at (23±2) °C.

Method: EN 648:2018.

PAPER STRAW did not contain any optically brightened fibers nor agents.

Microbiological and pathogenic analyses as follows:

Testing method	Unit	Result
Coliform – <i>Aspergillus nige</i> ATCC 6275	Spores/ML	Absent
Salmonella – <i>Bacillus subtilis</i> ATCC 6633	Spores/ML	Absent

Sensory analysis for odour performed at 23°C in 48 hours. Performed in accordance to EN1230-1 and EN1230-2. No formation of odour indicating decomposition of the product was found. Sensory analysis indirect conversion of taste: according to EN 1230-2.

**Result: <0.**

#### Index:

- 0 = no perceptible off-flavour
- 1 = off flavor just perceptible (still difficult to define)
- 2= moderate off-flavour
- 3= moderately strong off-flavour
- 4 = strong off-flavour

*Compliance with BfR Recommendation XXXVI*

Heavy metals:

Lead (Pb) not determinable < 0.003 mg/dm <sup>2</sup>
Cadmium (Cd) not determinable < 0.002 mg/dm <sup>2</sup>
Mercury (Hg) not determinable < 0.002 mg/dm <sup>2</sup>

□ EN647:1993, analysis according to IC.P-A.ES method

Formaldehyde (methanal)	Analysis has been performed according to the acetylacetone method in conformity with EN645:1994 and DN EN 1541:2001.	Amount of formaldehyde is <0.05 mg/dm <sup>2</sup> .	Remark: The limit refers to BfR Recommendation XXXVI.
Pentachlorophenol (PCP)	The determination has been performed according to DIN EN ISO 15320 by means of gas chromatography.	Amount of PCP is not determinable. <0.05 mg/kg dry matter.	Reference: LFGB&64 BVL B 82.02.8-2001.
AZO dyestuff	The determination has been performed according to DIN EN 14362-1:2017.		

Parameter	Unit	Result	Maximum allowable limit
o-Toluidine	mg/kg	< 10	30
2-Methoxyaniline	mg/kg	< 10	30
p-Chloroaniline	mg/kg	< 10	30
p-Kresidine	mg/kg	< 10	30
2,4,5-Trimethylaniline	mg/kg	< 10	30
4-Chloro-o-Toluidine	mg/kg	< 10	30
2,4-Toluylendiamine	mg/kg	< 10	30
2,4- Diaminoanisole	mg/kg	< 10	30
2-Naphthylamine	mg/kg	< 10	30
2-Amino-4-nitrotoluene	mg/kg	< 10	30
4-Aminodiphenyl	mg/kg	< 10	30
p-Aminoazobenzene	mg/kg	< 10	30
4,4'-Oxydianiline	mg/kg	< 10	30
Benzidine	mg/kg	< 10	30
4,4'-Diaminodiphenylmethane	mg/kg	< 10	30
o-Amioza zotoluene	mg/kg	< 10	30
3,3'-Dimethyl-4,4'-diaminodiphenylmethane	mg/kg	< 10	30
3,3'-Dimethylbenzidine	mg/kg	< 10	30
4,4'-Thiodianiline	mg/kg	< 10	30
3,3'-Dichlorobenzidine	mg/kg	< 10	30
4,4'-Methylene-bis-(2-chloraniline)	mg/kg	< 10	30
3,3'-Dimethoxybenzidine	mg/kg	< 10	30
<b>CONCLUSION:</b>		<b>PASS</b>	

Specific migration of Primary Aromatic Amines: The determination has been performed according to DIN EN 645:1994, LC-MS Analysis, all data <2. Result: PASS.

Migration of antibacterial components: The determination has been performed according to DIN EN 1104:2005, *Aspergillus nige* and *Bacillus subtilis* do not have migration and inhibition areas.

#### Statement regarding compostability

Statement provided by *Billerudkornas* on April 9<sup>th</sup> 2019, confirming that the paper samples provided by Cup The Market Ltd as source have been tested and certified according to:

- ISO 18 606.2013, "Packaging and the environment – Organic recycling".
- EN 13 432 (09-2000) "Packaging requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging."

#### **f. Substances and Process**

Paper straw fulfills the current requirements of the CONEG regulation and the European Directive (2002)/1 with regards to the heavy metals contents of packaging, as well as SCHV of REACH requirements.

#### **g. Certified management systems at the production site**



#### **h. Additional legislation and**

#### **regulations REACH**

We hereby confirm that our PAPER STRAW does not contain any substances classified as cancerogenic – causing cancer of category one and two.

We continuously check the development of the Candidates List and the substances for authorization, and only accept and use chemicals which comply with the REACH requirements.

To our knowledge, none of the articles contain any substance of very high concern present on the Candidate List with a concentration above 0.1% (W/W).

Consequently, we guarantee that our product complies with the REACH regulation.

## LFGB

Test item	Limit	Remark
Sensory test (odour and taste)	2.5 scale	The limit refers to BfR Recommendation XXXVI.
Extractable heavy metal contents	Pb < 10 µg/L; Cd < 5 µg/L; CrIII < 4 µg/dm <sup>2</sup> ; CrVI :not	
Formaldehyde content	1 mg/dm <sup>2</sup>	
Fastness of fluorescent	No less than grade 5	
Migration of dyes (Forcolored only)	No less than grade 5	
Azo Dyestuff Content	30 mg/kg	
Specific migration of primaryaromatic amine	2 µg/L and 10 µg/L	

## U.S. FDA 21 CFT176.170

Test item	Limit	Remark
Net Chloroform - SolubleExtractives-(i) Distilled Water	0.5 mg/in <sup>2</sup>	The limit refers to U.S. FDA21 CFR176.170
Net Chloroform - SolubleExtractives-(ii) n-Heptane		
Net Chloroform - SolubleExtractives-(iii) 8% Alcohol		
Net Chloroform - SolubleExtractives-(iv) 50% Alcohol		

## MOSH/MOAH

Test performed on Brown & white paper straw

Test method: With reference to EN13130-1:2004, analysis was performed by GC-FID & GC-MS.

Test location: Parameter has been submitted to an accredited laboratory.

Parameter	Limit	Result	Remark
MOSH (C10-16)	5.0 MDL	ND	No specification.
MOSH (C16-25)		ND	
MOSH (C25-35)		ND	
MOAH (C10-25)		ND	
MOAH (C25-35)		ND	
Analysis of		1. Migrate	
Test duration		2 hours	
Temperature		70 degrees Celsius	
Simulant used		3% Acetic Acid (W/V) Aqueous Solution	

**i. Type, name, and package of product and traceability of product**

Type	Product name	Package method
Industrial Straw	Paper straw	In BOPP / Paper foil
- Production, packaging, storage, and transportation signs: fulfills the GB/T 191 requirements.		
- Single packaging (or BOPP packaging) for PAPER STRAW fulfills the GB/T 24693-2009 9.1.2 requirements.		
- Each carton with solus QC number to trace the manufacturer date, time, each process ad worker number, according to ISO9001 and BSCI.		

**j. Disclaimer**

All the information set out herein is accurate to our current knowledge. We do not take any responsibility for information that has been provided to us by our suppliers, and on which we have relied wen producing the information contained herein.

This certificate is valid as of its date of publication, and we assume no liability for subsequent changes in information, contents, processes, regulatory requirements, or otherwise.

This certificate is only valid to the extent that it has been signed and delivered by an authorized employee of Cup The Market Ltd

None other than the addressee may rely on this certificate and we assume no liability whatsoever to any third party.

*Mr. Koorosh Madani*

*Director of Cup the Market Ltd*

