Huhtamaki

DECLARATION OF COMPLIANCE

11/06/2026

ID: GOHU-88XE6Z1-24.5

CUSTOMER: To whom it may concern

We hereby confirm that the products we supply do meet the requirements put forward in the legal framework presented below.

1. DESCRIPTION OF MATERIALS AND ARTICLES

Black Hot Sip Lids – Virgin polystyrene with mineral filler and pigments

HSL80
HSL90

2. COUNTRY OF ORIGIN

United Kingdom

3. INTENDED USES

Products listed above can be in contact with following food stuff:

Aqueous
Dairy
Alcohol >20%

In following conditions of temperature and time*:

Hot-fill (Up to 70°C for Up to 2 hours)
Hot-fill up to 100°C for up to 15 min

* It is the obligation of the recipient of this declaration to ensure that the packaging issuitable for the aimed processing and downstream use circumstances.

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4. LEGISLATION

We confirm that the products listed in section 1 fulfil the requirements on products intended for use in contact with food as defined in:

- Regulation (EC) No 1935/2004 (article 3, 11(5), 15 and 17) on materials and articlesintended 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 and its amendments up to date ofthis statement.
- Regulation (EC) No 10/2011 on plastic materials and articles intended to comeinto contact with food and its amendments up to date of this document.
- UK Statutory Instrument 704 (2019) on Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulation 2019.
- Regulation (EU) No 2025/40 on packaging and packaging waste (PPWR) Article 5(4) on heavy metals (sum of Pb, Cd, Hg, Cr(VI) ≤ 100 ppm) and Article 5(5) on PFAS (total fluorine (TF) ≤ 50 ppm).
- Regulation (EU) No 2025/40 on packaging and packaging waste (PPWR) Article 5(5) on PFAS (total fluorine (TF) ≤ 50 ppm).
- Regulation (EU) 2024/3190 on the use of bisphenols in certain materials and articles intended to come into contact with food (as amended).

5. ADDITIONAL LEGISLATION

We confirm that the products listed in section 1 fulfil the requirements on products intended for use in contact with food as defined in:

- Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH); based on the information from our suppliers, we can confirm that the product does not contain substances included on the list of Substances of Very High Concerning (SVHC) in concentration above 0.1 % (w/w).
- BfR IX (Colorants for Plastics and other Polymers used in Commodities) regarding the release of primary aromatic amines classified as carcinogens in classes 1A and 1B of the CLP Regulation (EC) 1272/2008 subject to a detection limit of 0.002 mg/kg food or food simulant.

6. MIGRATION

Laboratory: Eurofins Consumer Product Testing GmbH

According to Regulation (EC) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per 1 dm^2 of surface area of the packaging or 60 mg per 1 kg of foodstuff or food simulant (limiting value of the overall migration). The ratio of food contact surface area to volume used to establish the

compliance of the article/s were **2** dm²/100ml.

6.1. OVERALL MIGRATION

Following migration tests were conducted:

SIMULANT	TIME	TEMPERATURE
Ethanol 50 %	2 hours	70°C

7. SUBSTANCES WITH RESTRICTION

The products listed above may contain following substance/s with restriction/s:

CAS Number	PM REF Number	Substance	Restriction (mg/kg)
0110553-27-0	40020	2,4-bis(octylthiomethyl)-6-methyl- phenol	5
0000106-99-0	13630	butadiene	ND
0002082-79-3	68320	octadecyl 3-(3,5-di-tert-butyl-4- hydroxyphenyl)propionate	6
00100-42-5	24610	styrene	60
109-99-9	25150	tetrahydrofuran	0.6
13463-67-7	93440	titanium dioxide	60
0557-05-1	-	zinc stearate (SML expressed as zinc)	5 (T)

8. DUAL USE SUBSTANCES

The products listed above may contain following dual use substances:

CAS Number	E Number	Substance
1317-653	E170	calcium carbonate
1332-37-2	E172	iron oxide
9002-88-4	E914	polyethylene wax

9. OTHER SUBSTANCES

Bisphenol A (BPA) - Huhtamaki does not intentionally use or add BPA to itsproducts and has received statements from raw material suppliers confirming that BPA is not present.

Fluorinated substances - Huhtamaki does not intentionally use any Fluorine containing active compounds, such as PFOA and PFOS. The level of unintentionally added fluorine compounds is determined by measuring Total Organic Fluorine (TOF) content of products as part of routine testing. The products comply with Regulation (EU) No 2025/40 on packaging and packaging waste (PPWR) Article 5(5) on PFAS (total fluorine (TF) ≤ 50 ppm).

MOSH/MOAH - Currently, no legal limits exist for these substances. Based on the toxic potential (Update on risk assessment of mineral oil hydrocarbons in food, EFSA journal 2023;21(9):8215) of the aromatic constituents, the migration out of food contact materials made from recycled fibres should not be detectable. Huhtamaki applies this

principle to all products and conducts testing to confirm products comply.

Non-intentionally added substances (NIAS) - Under the legislation, overall migration limitsof permitted substances are 60 mg/kg and unauthorized substances may be present in food contact materials, provided they do not migrate at levels above 0.01 mg of substance per kg of food. However, there is no common agreed test or methodology for NIAS evaluation. We have worked with our raw material suppliers to identify potential non evaluated substances (NES) that might be present in our products as NIAS. We have had products analysed at an accredited laboratory for the presence of NIAS and NES. The testing has been conducted under foreseeable conditions of use, and it has been confirmed that the overall migration limit of 60 mg/kg of food was not exceeded by substances permitted under the applicable regulations. This includes substances listed in Annex II of EU 10/2011. If present, NIAS and NES migrating, in amounts of more than the limiting value of 0.01 mg/kg, go through a riskassessment to confirm that the migratory of the substances in the foodstuff has an exposure below the limits and there is a low probability for adverse health effects.

10. TRACEABILITY

Traceability is achieved by reference to coding on the item and/ or case label and/or order number.

This certificate is valid for 36 months or until there is substantial changes in the composition or productionthat bring about changes in the migration from the materials or articles or when new scientific data becomes available.

Huhtamaki (UK) Ltd.
Rowner Road
PO13 0PR
GOSPORT,
Hampshire
United Kingdom
Tel: +44 - (0) 23 9251 2434
E-mail: Gosport.Quality@huhtamaki.com