



Technical dossier

COMPLIANCE DATA SHEET

DoC valid until

2028-08-20

Issued 2026-08-20

Product group
Paper strawsHS code
4818201000Origin
CN

01 PRODUCT SPECIFICATIONS

Product group · Paper straws

	Base Information		Pallet Information	
	Article No	3703321-B	Qty Cartons	Ht incl. pallet
	Description	Straw paper Ø6x205 (250/5000) black (PO200) 8/16/40	8 ctn / Layer	—
	GSM	190	16 ctn / low pall	1.03 m
			40 ctn / full pall	2.35 m

Packaging Information

Pcs		Inner pack mm		Carton mm		Weight kg		Codes	
Pcs/pac	250	L	—	L	380	Net/ctn	8.00	Barcode ctn	17340162000341
Pcs/ctn	5000	W	—	W	270	Ctn wt	0.5	Barcode inner	7340162000344
		H	—	H	440	Gross/ctn	8.50		
				cbm/ctn	0.0451	Pack wt	0.40		

02 REGULATION COMPLIANCE

Applicable regulations & certificates

Regulation	Official title	Application date
EC 1935/2004	Regulation (EC) No 1935/2004 of the European Parliament and of the Council on materials and articles intended to come into contact with food	2004-12-03
EC 2023/2006	Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food	2008-08-01
EU 10/2011	Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food	2011-05-01
§30-31 LFGB · BfR XXXVI	German Food and Feed Code (LFGB) Sections 30 and 31, with BfR Recommendation XXXVI on paper and board for food contact	2005-09-07
EC 1907/2006 (REACH)	Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)	2007-06-01
EU 2025/40 (PPWR)	Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste	2026-08-12
EU 2023/1115 (EUDR)	Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation	2026-12-30

03 MATERIAL COMPOSITION

1 component(s)

#	Category	Material	Fraction	% w/w	Food contact
1	Paper	Cardboard	Cardboard	100%	Yes

04 FOOD CONTACT MATERIALS (FCM)

Scope

• Paper / moulded fibre — EC 1935/2004 · §30-31 LFGB · BfR XXXVI
• Not assessed under EU 10/2011 plastic overall migration

Regulatory framework

Selected route	Paper, board & moulded fibre – BfR / LFGB (not EU 10/2011)
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Executive summary – tests requested (LFGB / BfR · PPWR Art. 5)		
Test requested	Source	Conclusion
Formaldehyde content for paper and paperboard in contact with foodstuffs – §30 and 31 LFGB and BfR Recommendation	LFGB / BfR	PASS
Specific migration of primary aromatic amine for paper and paperboard in contact with foodstuffs – §30 and 31 LFGB, BfR Recommendation	LFGB / BfR	PASS
Fastness of fluorescence for paper and paperboard in contact with foodstuffs – §30 and 31 LFGB and BfR Recommendation	LFGB / BfR	PASS
Migration of dyes for paper and paperboard in contact with foodstuffs – §30 and 31 LFGB and BfR Recommendation	LFGB / BfR	PASS
Azo dyestuff content for paper and paperboard in contact with foodstuffs – §30 and 31 LFGB and BfR Recommendation	LFGB / BfR	PASS
Sensory test (odour and taste) for materials in contact with foodstuffs – EC No. 1935/2004 and §30 and 31 LFGB and BfR Recommendation	LFGB / BfR	PASS
Heavy metals requirements of the EU Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR) Article 5(4)	PPWR Art. 5	PASS
Total fluorine content in food contact packaging (EU Packaging and Packaging Waste Regulation (EU) 2025/40)	PPWR Art. 5	PASS
PFAS in food contact packaging (PPWR (EU) 2025/40)	PPWR Art. 5	PASS

Intended use – test conditions (food simulant / temperature / duration / overall migration category)				
#	Food simulant / extractant	Temp (°C)	Duration	OM test condition
1	distilled_water · Distilled water	23	24h	NA · Not applicable (non-plastic / not EU 10/2011 OM)

Thermal range · appliance safety · simulants (migration)					
Min °C	Max °C	Microwave	Oven	Freezer	Simulants used
23	23	—	—	—	distilled_water · Distilled water

BfR Recommendation XXXVI – paper & board (chemical analysis)			
Test item	Result	Test item	Result
Sensory (Odour & Taste)	PASS	Extractable Heavy Metals	PASS
Migration of Dyes	PASS	Formaldehyde	PASS
Azo Dyestuffs	PASS	Primary Aromatic Amines	PASS
Fastness of Fluorescence	PASS	PAHs (AfPS GS 2019:01)	PASS

Substance declarations			
BPA Free	PFAS Free	No IAS	REACH SVHC < 0.1%
YES	YES	YES	YES

05	PACKAGING & PACKAGING WASTE (PPWR)	EU Regulation 2025/40
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Covered by group-level PPWR deliverables	
Packaging type	PG-180
EU DoC (Annex VIII)	Not yet issued for this product group
Technical documentation (Annex VII)	Annex VII technical file · Product group 180

Recyclability – PPWR Art. 6(1) / EN 13430		
Requirement	Assessment standard	Result
Art. 6(1) – packaging shall be recyclable (from 12 Aug 2026; transitional path)	EN 13430 : 2004	PASS

Packaging minimisation	
Criterion	Met
Weight Optimised	YES
No Unnecessary Layers	YES
Double Wall Justified	YES

Substance restrictions					
Parameter	Detected	Limit	Method	Result	Remark
Heavy metals sum (Pb+Cd+Hg+Cr VI)	LT 20 mg/kg	100 mg/kg	–	PASS	PPWR Art. 5(4)
Individual non-polymeric PFAS (max)	–	25 ppb	Targeted PFAS (GC-MS/LC-MS-MS)	PASS	Art. 5(5)
Sum of non-polymeric PFAS	–	250 ppb	Targeted PFAS (GC-MS/LC-MS-MS)	PASS	Art. 5(5)
Total fluorine (all PFAS incl. polymeric)	LT 20 mg/kg	50 mg/kg	EN 14582:2016	PASS	Art. 5(5)
PFAS Art. 5(5) compliant (declaration)	–	–	EN 14582:2016 (total fluorine screening)	YES	25 ppb / 250 ppb / 50 ppm

Reuse system				
Designed for reuse	System	Min rotations	Deposit scheme	Notes
NO	–	–	NO	Not designed for reuse. Single-use food-service article; no deposit-return or closed-loop reuse system.

Upcoming requirements – phased application under PPWR (EU) 2025/40	
Requirement	Applies from
Recyclability Grade	2030-01
Empty Space Ratio (%)	2030-01
Compostability (Art. 9)	2028-02
Labeling & Marking (Art. 12)	2028-08
Recycled Content (Art. 7)	2030-01

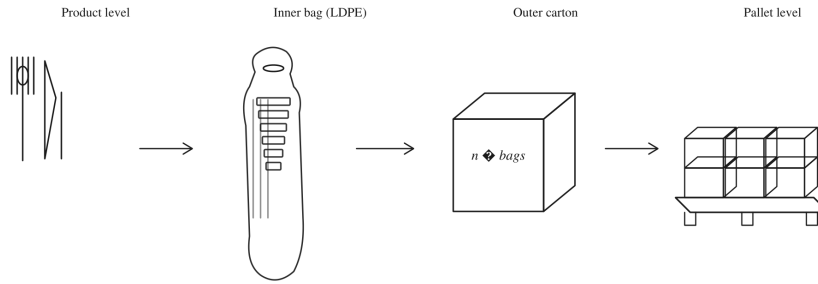
These obligations are not yet applicable at the date of issue; documentation will be provided as they enter into application.

06EPR PACKAGING HIERARCHY

Packaging and intended use

Food-contact single-use product; packed in LDPE inner bag with label, outer carton sealed with tape; palletised with stretch wrap for shipment.

Schematic, not to scale and not a dimensioned manufacturing drawing; the product level is drawn as an exemplar. Bag counts, carton multiples and pallet loads shown are illustrative only and do not represent actual SKU quantities – for reference to understand the packaging system.



The figure shows how unit, bag, carton and pallet relate. Counts printed in the drawing are examples only – not the quantities for this product group.

Type	Units	Sorting	Material	Weight (kg)	Colour	Recyclability
Product	1 pcs	Recycling	Cardboard	0.0016	–	–
Primary	250 bag	Recycling	Plastic LDPE - Low Density Polyethylene	0.0200	Natural / translucent	A
Primary	1 label	Recycling	Paper / PP label	–	Multicolour print	Not assessed
Secondary	5000 crt	Recycling	Cardboard	0.4510	Brown (kraft)	A
Secondary	5000 crt	Recycling	Tape – BOPP · Acrylic PSA (1:1)	0.0050	Transparent	Not recyclable
Tertiary	200000 pl	Recycling	Wood	15.0000	Natural wood	Reusable
Tertiary	200000 pl	Recycling	Plastic LLDPE - Linear Low Density Polyethylene	0.1316	Transparent	A

07		TRACEABILITY & DUE DILIGENCE (EUDR)		EU Deforestation Regulation	
Product group level (order-specific traceability is per shipment)					
HS code (classification)		Commodity type		EUDR relevant (product record)	
4818201000		Paper/Pulp		YES	
EUDR support available					
YES					

Product group name and origin are in the document header. Due diligence and batch claims are documented per order.

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