



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-U	Qty Cartons	Ht incl. pallet
	Description	Straw paper Ø6x205 (250/5000) brown (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	17340162002000
Pcs/ctn	5000	W	—	W	270	Ctn wt	0.5	Barcode inner	7340162002003
		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)
----------------	--

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
----	------------------------------------	-----------------------

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

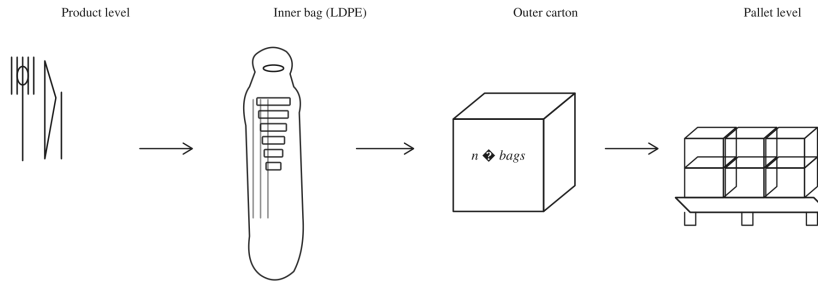
These obligations are not yet applicable at the date of issue; documentation will be provided as they enter into application.

06

EPR 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.

Issuing organisation ZIP Trading Overseas AB Killinggränd 13, SE-175 45 Järfälla, www.ziptrading.biz	Authorised signature <i>Kevin Xiang</i> Kevin Xiang Compliance Manager
---	---