



Technical dossier

## COMPLIANCE DATA SHEET

DoC valid until

2028-08-08

Issued 2026-08-08

Product group  
Cup-carrier/SleevesHS code  
4823699000Origin  
CN

## 01 PRODUCT SPECIFICATIONS

Product group - Cup-carrier/Sleeves



## Base Information

|             |                                                         |
|-------------|---------------------------------------------------------|
| Article No  | 3781720                                                 |
| Description | Paper Cutlery Spoon 156mm<br>(100/2000) Kraft 15/60/120 |
| GSM         | 190                                                     |

## Pallet Information

|                     |                 |
|---------------------|-----------------|
| Qty Cartons         | Ht incl. pallet |
| 15 ctn / Layer      | —               |
| 60 ctn / low pall   | 1.27 m          |
| 120 ctn / full pall | 2.39 m          |

## Packaging Information

| Pcs     |      | Inner pack mm |   | Carton mm |        | Weight kg |      | Codes         |                |
|---------|------|---------------|---|-----------|--------|-----------|------|---------------|----------------|
| Pcs/pac | 100  | L             | — | L         | 330    | Net/ctn   | 6.60 | Barcode ctn   | 17340162009030 |
| Pcs/ctn | 2000 | W             | — | W         | 165    | Ctn wt    | 0.5  | Barcode inner | 7340162009033  |
|         |      | H             | — | H         | 280    | Gross/ctn | 7.10 |               |                |
|         |      |               |   | cbm/ctn   | 0.0152 | Pack wt   | 0.33 |               |                |

## 02 REGULATION COMPLIANCE

Applicable regulations &amp; 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       |
| EU 2015/863 (RoHS)      | Commission Delegated Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU as regards the list of restricted substances                                                          | 2019-07-22       |
| GB 4806.14-2023         | GB 4806.14-2023 National food safety standard — Inks for food contact materials and articles                                                                                                 | 2024-09-06       |
| 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

3 component(s)

| # | Category | Material                                | Fraction         | % w/w | Food contact  |
|---|----------|-----------------------------------------|------------------|-------|---------------|
| 1 | Paper    | Cardboard                               | Cardboard        | 93%   | Yes           |
| 2 | Plastic  | Plastic LDPE - Low Density Polyethylene | Flexible plastic | 7%    | Yes           |
| 3 | Ink      | Water-based Printing Ink                | Printing ink     | —     | Exterior only |

| Intended use — test conditions (food simulant / temperature / duration / overall migration category) |                            |           |          |                                       |
|------------------------------------------------------------------------------------------------------|----------------------------|-----------|----------|---------------------------------------|
| #                                                                                                    | Food simulant (EU 10/2011) | Temp (°C) | Duration | Overall migration (OM) test condition |
| 1                                                                                                    | B · 3% acetic acid         | 100       | 1h       | OM4 · 1 h at 100 °C                   |
| 2                                                                                                    | A · 10% ethanol            | 100       | 1h       | OM4 · 1 h at 100 °C                   |

| Thermal range · appliance safety · simulants (migration) |        |           |      |         |                                       |
|----------------------------------------------------------|--------|-----------|------|---------|---------------------------------------|
| Min °C                                                   | Max °C | Microwave | Oven | Freezer | Simulants used                        |
| 100                                                      | 100    | OK        | —    | —       | B · 3% acetic acid<br>A · 10% ethanol |

| 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   |

| Plastic FCM — migration & sensory declarations (EU 10/2011 · LFGB · BfR) |        |
|--------------------------------------------------------------------------|--------|
| Requirement                                                              | Result |
| Overall Migration (EU 10/2011)                                           | PASS   |

| Substance declarations |           |        |
|------------------------|-----------|--------|
| BPA Free               | PFAS Free | No IAS |
| YES                    | YES       | YES    |

| Printing ink compliance                 |        |
|-----------------------------------------|--------|
| Requirement                             | Result |
| Water-based Ink — EU RoHS (EU) 2015/863 | PASS   |
| Food-contact Inks — GB 4806.14-2023     | PASS   |

| Overall migration (OML) — EU 10/2011 |       |        |               |                      |                                      |
|--------------------------------------|-------|--------|---------------|----------------------|--------------------------------------|
| Measured                             | Limit | Unit   | Declared pass | Measured / limit (%) | Remark                               |
| 2                                    | 10    | mg/dm² | YES           | 20%                  | Recorded as pass in compliance data. |

| Covered by group-level PPWR deliverables |                                              |
|------------------------------------------|----------------------------------------------|
| Packaging type                           | PG-165                                       |
| EU DoC (Annex VIII)                      | Not yet issued for this product group        |
| Technical documentation (Annex VII)      | Annex VII technical file · Product group 165 |

| Recyclability — PPWR Art. 6(1) / EN 13430                 |
|-----------------------------------------------------------|
| Performance grade foresight (A/B/C — mandatory from 2030) |

| Grade | Mono-material |
|-------|---------------|
| B     | —             |

| 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)                                                                                  |
| Total fluorine (all PFAS incl. polymeric) | LT 20 mg/kg | 50 mg/kg  | EN 14582:2016 | PASS   | Paper group total fluorine screening (PFAS paper group.pdf); pending lot-specific confirmation. |
| PFAS Art. 5(5) compliant (declaration)    | —           | —         | —             | YES    | 25 ppb / 250 ppb / 50 ppm                                                                       |

| Upcoming requirements — phased application under PPWR (EU) 2025/40 |              |
|--------------------------------------------------------------------|--------------|
| Requirement                                                        | Applies from |
| 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.

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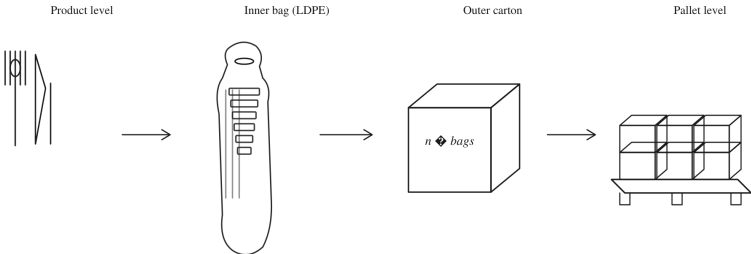
EPR PACKAGING HIERARCHY

—

| 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.

| Packaging levels |
|------------------|
|------------------|



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.

| Type    | Units | Sorting   | Material                                | Weight (kg) | Colour | Recyclability |
|---------|-------|-----------|-----------------------------------------|-------------|--------|---------------|
| Product | 1 pcs | Recycling | Cardboard                               | 0.0031      | —      | B             |
| Product | 1 pcs | Recycling | Plastic LDPE - Low Density Polyethylene | 0.0002      | —      | B             |

| Type      | Units     | Sorting   | Material                                        | Weight (kg) | Colour                | Recyclability  |
|-----------|-----------|-----------|-------------------------------------------------|-------------|-----------------------|----------------|
| Product   | 1 pcs     | Recycling | Water-based Printing Ink                        | 0.0000      | —                     | B              |
| Primary   | 100 bag   | Recycling | Plastic LDPE - Low Density Polyethylene         | 0.0200      | Natural / translucent | A              |
| Primary   | 1 label   | Recycling | Paper / PP label                                | —           | Multicolour print     | Not assessed   |
| Secondary | 2000 crt  | Recycling | Cardboard                                       | 0.1520      | Brown (kraft)         | A              |
| Secondary | 2000 crt  | Recycling | Tape — BOPP · Acrylic PSA (1:1)                 | 0.0017      | Transparent           | Not recyclable |
| Tertiary  | 240000 pl | Recycling | Wood                                            | 15.0000     | Natural wood          | Reusable       |
| Tertiary  | 240000 pl | Recycling | Plastic LLDPE - Linear Low Density Polyethylene | 0.1338      | Transparent           | A              |

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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) |
|--------------------------|----------------|--------------------------------|
| 4823699000               | 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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