



Technical dossier

COMPLIANCE DATA SHEET

DoC valid until

2028-08-20

Issued 2026-08-20

Product group

Lid paper hot/cold cup

HS code

4823691000

Origin

CN

01 PRODUCT SPECIFICATIONS

Product group - Lid paper hot/cold cup

	Base Information		Pallet Information	
	Article No	5722090-U1	Qty Cartons	Ht incl. pallet
	Description	Lid paper 12-20oz Ø90 C-hole (50/1000) Kraft DPE 6/18/36	6 ctn / Layer	—
	GSM	300	18 ctn / low pall	1.32 m
			36 ctn / full pall	2.49 m

Packaging Information

Pcs		Inner pack mm		Carton mm		Weight kg		Codes	
Pcs/pac	50	L	—	L	400	Net/ctn	4.70	Barcode ctn	17340162009603
Pcs/ctn	1000	W	—	W	385	Ctn wt	0.5	Barcode inner	7340162009606
		H	—	H	390	Gross/ctn	5.20		
				cbm/ctn	0.0601	Pack wt	0.24		

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
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
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

3 component(s)

#	Category	Material	Fraction	% w/w	Food contact
1	Paper	Cardboard	Cardboard	93%	Yes
			Flexible plastic		Yes

#	Category	Material	Fraction	% w/w	Food contact
2	Plastic	Plastic LDPE - Low Density Polyethylene		7%	
3	Ink	Water-based Printing Ink	Printing ink	—	Exterior only

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FOOD CONTACT MATERIALS (FCM)

• EC 1935/2004 · BfR XXXVI (paper) · EU 10/2011 (plastic only) — field scope
• Values = supplier-entered data; not a legal declaration

Scope

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 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

BfR XXXVI paper/board package covered by group FCM evidence (Paper cup PE FCM.pdf and related paper-group reports).

Plastic FCM — migration & sensory declarations (EU 10/2011 · LFGB · BfR)	
Requirement	Result
Sensory (Odour & Taste)	PASS
Overall Migration (EU 10/2011)	PASS
Specific Migration — Heavy Metals	PASS
Specific Migration — Primary Aromatic Amines	PASS

Report: Paper cup PE FCM.pdf — PE food-contact lining migration / sensory package.

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

Exterior water-based ink; compliance flags as recorded. Non-food-contact print surface only.

Overall migration (OML) — EU 10/2011					
Measured	Limit	Unit	Declared pass	Measured / limit (%)	Remark
					PE lining migration screen; see Paper cup PE FCM.pdf

Measured	Limit	Unit	Declared pass	Measured / limit (%)	Remark
2	10	mg/dm ²	YES	20%	

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PACKAGING & PACKAGING WASTE (PPWR)

EU Regulation 2025/40

Covered by group-level PPWR deliverables	
Packaging type	PG-116
EU DoC (Annex VIII)	Not yet issued for this product group
Technical documentation (Annex VII)	Annex VII technical file · Product group 116

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.

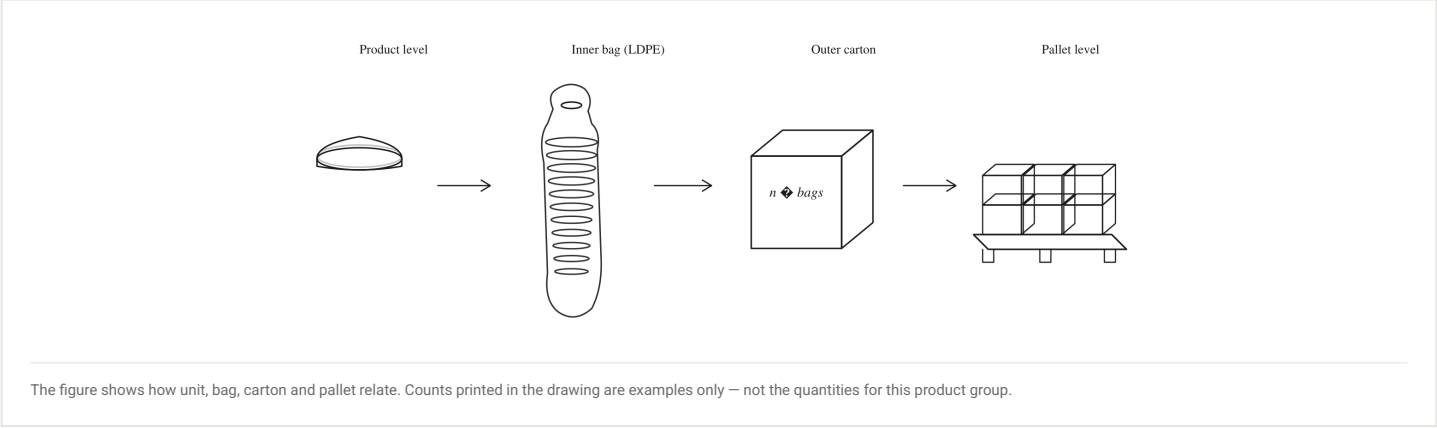
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EPR PACKAGING HIERARCHY

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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.



Type	Units	Sorting	Material	Weight (kg)	Colour	Recyclability
Product	1 pcs	Recycling	Cardboard	0.0044	—	B
Product	1 pcs	Recycling	Plastic LDPE - Low Density Polyethylene	0.0003	—	B
Product	1 pcs	Recycling	Water-based Printing Ink	0.0000	—	B
Primary	50 bag	Recycling	Plastic LDPE - Low Density Polyethylene	0.0200	Natural / translucent	A
Primary	1 label	Recycling	Paper / PP label	—	Multicolour print	Not assessed
Secondary	1000 crt	Recycling	Cardboard	0.6010	Brown (kraft)	A
Secondary	1000 crt	Recycling	Tape – BOPP · Acrylic PSA (1:1)	0.0066	Transparent	Not recyclable
Tertiary	36000 pl	Recycling	Wood	15.0000	Natural wood	Reusable
Tertiary	36000 pl	Recycling	Plastic LLDPE - Linear Low Density Polyethylene	0.1394	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)	
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.

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
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