



Technical dossier

## COMPLIANCE DATA SHEET

DoC valid until

2028-08-11

Issued 2026-08-11

Product group  
Lid paper Alum contHS code  
4823691000Origin  
CN

## 01 PRODUCT SPECIFICATIONS

Product group - Lid paper Alum cont



## Base Information

|             |                                                              |
|-------------|--------------------------------------------------------------|
| Article No  | 3250850                                                      |
| Description | Lid paper 850ml 202x134 (al.cont)<br>(1000/1000) DPE 6/48/96 |
| GSM         | 300                                                          |

## Pallet Information

|                    |                 |
|--------------------|-----------------|
| Qty Cartons        | Ht incl. pallet |
| 6 ctn / Layer      | —               |
| 48 ctn / low pall  | 1.05 m          |
| 96 ctn / full pall | 1.96 m          |

## Packaging Information

| Pcs     |      | Inner pack mm |   | Carton mm |        | Weight kg |      | Codes         |               |
|---------|------|---------------|---|-----------|--------|-----------|------|---------------|---------------|
| Pcs/pac | 1000 | L             | — | L         | 540    | Net/ctn   | 8.50 | Barcode ctn   | 7350013947209 |
| Pcs/ctn | 1000 | W             | — | W         | 202    | Ctn wt    | 0.5  | Barcode inner | 96            |
|         |      | H             | — | H         | 113    | Gross/ctn | 9.00 |               |               |
|         |      |               |   | cbm/ctn   | 0.0123 | Pack wt   | 8.50 |               |               |

## 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       |
| 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)

Scope

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

| 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   |

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 <sup>2</sup> | YES           | 20%                  |        |

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PACKAGING & PACKAGING WASTE (PPWR)

EU Regulation 2025/40

|                                          |                                              |
|------------------------------------------|----------------------------------------------|
| Covered by group-level PPWR deliverables |                                              |
| Packaging type                           | PG-170                                       |
| EU DoC (Annex VIII)                      | Not yet issued for this product group        |
| Technical documentation (Annex VII)      | Annex VII technical file · Product group 170 |

|                                                           |               |
|-----------------------------------------------------------|---------------|
| 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. |       |               |           |             |        |               |
| Type                                                                                                                                            | Units | Sorting       | Material  | Weight (kg) | Colour | Recyclability |
| Product                                                                                                                                         | 1 pcs | General waste | Cardboard | 0.0079      | —      | B             |

| Type      | Units    | Sorting       | Material                                        | Weight (kg) | Colour                | Recyclability  |
|-----------|----------|---------------|-------------------------------------------------|-------------|-----------------------|----------------|
| Product   | 1 pcs    | General waste | Plastic LDPE - Low Density Polyethylene         | 0.0006      | —                     | B              |
| Product   | 1 pcs    | General waste | Water-based Printing Ink                        | 0.0000      | —                     | B              |
| Primary   | 1000 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                                       | 0.1230      | Brown (kraft)         | A              |
| Secondary | 1000 crt | Recycling     | Tape — BOPP · Acrylic PSA (1:1)                 | 0.0014      | Transparent           | Not recyclable |
| Tertiary  | 96000 pl | Recycling     | Wood                                            | 15.0000     | Natural wood          | Reusable       |
| Tertiary  | 96000 pl | Recycling     | Plastic LLDPE - Linear Low Density Polyethylene | 0.1098      | Transparent           | A              |

| 07TRACEABILITY & 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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