



Technical dossier

COMPLIANCE DATA SHEET

DoC valid until

2028-08-11

Issued 2026-08-11

Product group
Cup-carrier/SleevesHS code
4823699000Origin
CN

01 PRODUCT SPECIFICATIONS

Product group - Cup-carrier/Sleeves

	Base Information		Pallet Information	
	Article No	3703321-WR	Qty Cartons	Ht incl. pallet
	Description	Straw paper Ø6x205 (250/5000) black ind wrap 6/12/30	6 ctn / Layer	—
	GSM	190	12 ctn / low pall	1.09 m
			30 ctn / full pall	2.50 m

Packaging Information									
Pcs		Inner pack mm		Carton mm		Weight kg		Codes	
Pcs/pac	250	L	—	L	400	Net/ctn	8.00	Barcode ctn	17340162000457
Pcs/ctn	5000	W	—	W	400	Ctn wt	0.5	Barcode inner	7340162000450
		H	—	H	470	Gross/ctn	8.50		
				cbm/ctn	0.0752	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
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 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.

06

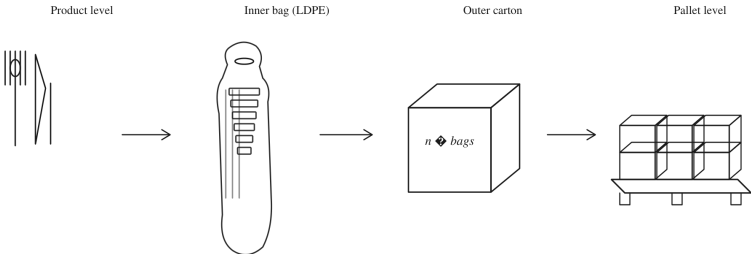
EPR PACKAGING HIERARCHY

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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.

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	0.0015	—	B
Product	1 pcs	Recycling	Plastic LDPE - Low Density Polyethylene	0.0001	—	B

Type	Units	Sorting	Material	Weight (kg)	Colour	Recyclability
Product	1 pcs	Recycling	Water-based Printing Ink	0.0000	—	B
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	0.7520	Brown (kraft)	A
Secondary	5000 crt	Recycling	Tape — BOPP · Acrylic PSA (1:1)	0.0083	Transparent	Not recyclable
Tertiary	150000 pl	Recycling	Wood	15.0000	Natural wood	Reusable
Tertiary	150000 pl	Recycling	Plastic LLDPE - Linear Low Density Polyethylene	0.1400	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.

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