



Technical dossier

## COMPLIANCE DATA SHEET

DoC valid until

2028-08-20

Issued 2026-08-20

Product group  
Paper Micro contHS code  
4823699000Origin  
CN

## 01 PRODUCT SPECIFICATIONS

Product group · Paper Micro cont

|  | Base Information |                                                                | Pallet Information |                 |
|-----------------------------------------------------------------------------------|------------------|----------------------------------------------------------------|--------------------|-----------------|
|                                                                                   | Article No       | 5264500                                                        | Qty Cartons        | Ht incl. pallet |
|                                                                                   | Description      | Paper micro cont 500ml<br>172x120x41 (50/300) Kraft<br>6/12/30 | 6 ctn / Layer      | —               |
|                                                                                   |                  |                                                                | 12 ctn / low pall  | 1.03 m          |
|                                                                                   | GSM              | 300                                                            | 30 ctn / full pall | 2.35 m          |

## Packaging Information

| Pcs     |     | Inner pack mm |   | Carton mm |        | Weight kg |      | Codes         |                |
|---------|-----|---------------|---|-----------|--------|-----------|------|---------------|----------------|
| Pcs/pac | 50  | L             | — | L         | 380    | Net/ctn   | 4.95 | Barcode ctn   | 17340162009542 |
| Pcs/ctn | 300 | W             | — | W         | 355    | Ctn wt    | 0.5  | Barcode inner | 7340162009545  |
|         |     | H             | — | H         | 440    | Gross/ctn | 5.45 |               |                |
|         |     |               |   | cbm/ctn   | 0.0594 | Pack wt   | 0.83 |               |                |

## 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 PP - Polypropylene pure |              | 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-135                                       |
| EU DoC (Annex VIII)                      | Not yet issued for this product group        |
| Technical documentation (Annex VII)      | Annex VII technical file - Product group 135 |

|                                                           |               |
|-----------------------------------------------------------|---------------|
| 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 |
| Single-wall PE-lined paper cup sized to fill volume. PE lining limited to the barrier function required for hot/cold beverage contact. No decorative over-pack on the sales unit. Empty-space ratio (Art. 9 e-commerce / grouped packaging) is not applicable to the cup body itself; transport packaging is specified under EPR. |     |

| 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)    | —           | —         | 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 vending cup; no deposit-return or closed-loop reuse system. |

| Upcoming requirements – phased application under PPWR (EU) 2025/40 |              |
|--------------------------------------------------------------------|--------------|
| Requirement                                                        | Applies from |
| Empty Space Ratio (%)                                              | 2030-01      |
| Compostability (Art. 9)                                            | 2028-02      |
| Material Identification Marking                                    | 2028-08      |
| Consumer Sorting Instruction Label                                 | 2028-08      |
| QR / Digital Label (DPP)                                           | 2029-02      |

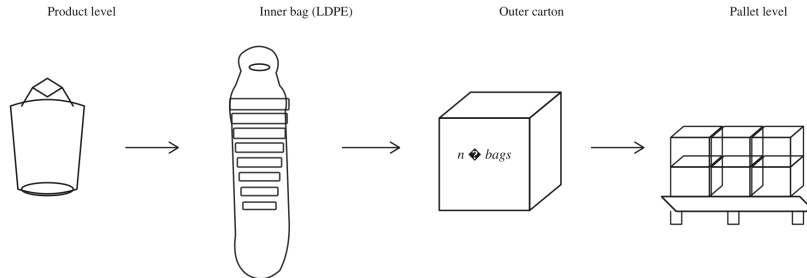
These obligations are not yet applicable at the date of issue; documentation will be provided as they enter into application.

## 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.

## PACKAGING HIERARCHY – schematic



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                                       | 0.0153      | —                     | B              |
| Product   | 1 pcs   | Recycling | Plastic PP - Polypropylene pure                 | 0.0012      | —                     | 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 | 300 crt | Recycling | Cardboard                                       | 0.5940      | Brown (kraft)         | A              |
| Secondary | 300 crt | Recycling | Tape – BOPP · Acrylic PSA (1:1)                 | 0.0065      | Transparent           | Not recyclable |
| Tertiary  | 9000 p1 | Recycling | Wood                                            | 15.0000     | Natural wood          | Reusable       |
| Tertiary  | 9000 p1 | Recycling | Plastic LLDPE - Linear Low Density Polyethylene | 0.1316      | Transparent           | A              |

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

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