Declaration of Compliance

with legislation(s) for articles intended to come into contact with foodstuffs

In compliance with the Union Guidelines on regulation (EU) No 10/2011 as regards information in the supply chain

1. DoC Issued by:

Issued by
Company : Haval Disposables BV
Address : Oost-om 33
5422 VX
Gemert, Netherlands
Contact person : Mr. E. v. Limpt

2. Manufactured by:

Company : Haval Disposables BV
Address : Oost-om 33
5422 VX
Gemert, Netherlands

3. Identity (product or representative sample)

The Circulware range PPMF coloured delivered by Haval Disposables to Papstar GmbH, consisting of the basic polymers PPC, sustainable mineral Masterbatch and Master batches white, black and standard Circulware range colors.
This product range consists out of the following products:

- CirculCups; CC100 – CC200 – CC300 – CC400 ml
- CirculCup lids flat and sippy lid
- CirculBoxes; C300 – C400 – C500 – C600 – C700 – C800 series
- CirculBowls: CB400 – CB800 – CB1200 series
- CirculPlates, C900 series

4. Issued date:

04-05-2023

5. EU regulatory status of the above mentioned articles

We declare that:

EC Regulation 1935/2004
The above mentioned articles delivered by Haval Disposables complies with the safety aspects set out in Article 3(1)(a) of the Framework Regulation (EC) 1935/2004

GMP
The above mentioned articles delivered by Haval Disposables have been manufactured in accordance with the relevant requirements of Commission Regulation EC No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

Traceability
Haval Disposables has systems in place fulfilling the relevant aspects on traceability as required in article 17.1 of Regulation (EC) No. 1935/2004.

5.a Used monomers and additives.
The above mentioned articles have been manufactured only with monomers, other starting substances and additives that are authorised under the Plastics Regulation 10/2011/EC (up to and including the amendment (EU) 2020/1245).

5.b Other substances used in the formulation of the above mentioned articles
Other substances used in the manufacturing of the above mentioned articles are listed in:

Dutch Regeling Verpakkingen- en Gebruiksartikelen (Warenwet).
Chapter 1 – Kunststoffen.
https://zoek.officielebekendmakingen.nl/stcrt-2014-8531.html

Pigments and Colorants
Colorants and/or pigments used in the formulation of the above mentioned articles**,** that are not regulated by 10/2011/EC (up to and including the amendment (EU) 2020/1245), are in compliance with:

Dutch Regeling Verpakkingen- en Gebruiksartikelen (Warenwet).
Chapter XI – Colorants and pigments
https://zoek.officielebekendmakingen.nl/stcrt-2014-8531.html

Or:

Resolution AP (89) 1 of the Council of Europe "On the use of colorants in plastic materials coming into contact with food", II, 2 (purity).

5.c Migration
The above mentioned articles complies with the overall and specific migration limit tested under the following conditions:

- Test conditions: 10 days at 60°C - 2 hours 100°C (simulant A and B)
  10 days at 60°C - 0,5 hour 121°C (simulant D2)

Migration experiments carried out with food simulants during the above mentioned conditions have shown that under these test conditions (according to EN 1186) the specific and overall migration limits were not exceeded in 3% acetic acid, 10% ethanol, 95% ethanol and olive oil. The foodstuffs corresponding with the food simulants are stipulated in EU regulation 10/2011/EC.

It should be noted that the representative samples have been tested for the above mentioned conditions only. It is the responsibility of the legal entity responsible for placing on the market of the article to ensure that the usage of the articles is safe, lawful and technically suitable and can determined through mutual consultation and agreement.

5.d Organoleptic testing.
Sensorial testing showed no significant deteriorations.

6. Regulatory status of used substances

We declare that:

6.a Used substances subject to restrictions in national legislation
Substances (colorants, polymer production aids, substances on the provisional list) used in the formulation of the above mentioned articles are subjected to restrictions in national legislation.

6.b Monomers
Monomer(s) used in the formulation of the above mentioned articles are listed in EU regulation 10/2011/EC (up to and including the amendment (EU) 2020/1245).

6.c Additives
Additives used in the formulation of the above mentioned articles are listed in EU regulation 10/2011/EC (up to and including the amendment (EU) 2020/1245).

6.d Substances listed in Annex II (1), metals
Substances listed in Annex II (1), to the Plastics Regulation are present. These substances cannot be released above the limit specified.

6.e PAAs (Primary Aromatic Amines) covered by Annex II to the Plastics regulation
The products may contain Primary Aromatic Amines. Paas cannot be released above the limit specified.

6.f Restrictions of substances in the above mentioned articles mentioned in points a), b), c), d) and e) are complied with, based on worst case calculations and migration testing.

7. Presence of dual use additives.

A substance is defined as a "Dual Use Additive" if the chemical identity of the plastic additive matches that of an authorized food additive or flavouring, regardless of its purity or whether or not the substance is subject to a restriction in food and/or plastic. In case of salts it is the salt that matters, not the authorized acid, phenol or alcohol.

Information on substances with specific migration limit in accordance with Regulation (EU) No 10/2011 and dual use substances:

FCM No	Ref. No	CAS No	SML mg/kg	Substance name	Dual use substance
-	-	-	1	Aluminium	Yes
-	-	-	1	Barium	No
-	-	-	3,6	Chromium(III)	No
-	-	-	48	Iron oxides and hydroxides	Yes
-	-	-	0,6	Manganese	No
-	-	-	5	Zinc salt	No
9	30610	-	60	Fatty acids	Yes
11	30960	-	60	Polyglycerol esters of fatty acids	Yes
53	56585	-	60	Mono-and diglycerides of fatty acids	Yes
103	18100 / 55920	56-81-5	60	Glycerol	Yes
105/106	22780/70400 24550/89040		60	Sodium, potassium and calcium salts of fatty acids and magnesium salts of fatty acids	Yes
106	24550/89040	1592-23-0	60	Calcium stearate	Yes
106	24550/89040	557-05-1	5	Zinc stearate	No
109	23740/81840	57-55-6	60	Propylene glycol	Yes
110	93520	59-02-9/ 10191-41-0	60	Alpha tocopherol	Yes
116	13090/37600	532-32-1	60	Sodium benzoate	Yes
139	14680/44160	77-92-9	60	Citric acid	Yes
139	14680/44160	866-84-2	60	Potassium citrate	Yes
141	13380/25600/ 94960	77-99-6	6	1,1,1-trimethylolpropane	No
186	14020	98-54-4	0,05	4-tert-butylphenol	No
321	36080	137-66-6	60	Ascorbyl palmitate	Yes
398	35760	1309-64-4	0,04	Antimony trioxide as antimony	No
411	42080	1333-86-4	60	Carbon black	No
433	68320	2082-79-3	6	Octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionate	No
477	46720	4130-42-1	4,8	2,6-di-tert-butyl-4-ethylphenol	No
610	93440	13463-67-7	60	Titanium dioxide	No
615	92080	14807-96-6	60	Talcum	Yes
661	95360	27676-62-6	5	1,3,5-tris(3,5-di-tert-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	No
779	39815	182121-12-6	0,05	9,9-bis(methoxymethyl)fluorene	No
783	55910	736150-63-3	60	glycerides, castor-oil mono-, hydrogenated, acetates	No

8. Final use of the above mentioned articles

8.a These articles are allowed to be in contact with all types of food; aqueous, acidic, alcoholic and fatty.

8.b These articles are intended to come into contact with food under the following conditions of use: Any long term storage at room temperature and all storage times at refrigerated and frozen conditions, including when packaged under hot-fill conditions, and/or heating up to a temperature T where 70 °C ≤ T ≤ 100 °C for maximum of t = 120/2^((T-70)/10) minutes (including microwave heating).

8.c The maximum ratio of the area of the food contact material to the volume is 6 dm^2 FCM / 1 kg food.

Other testing methods valid for Circulware range mentioned:

These articles are repeated use articles which have been tested and validated as **dishwasher safe**. The testing method used is the mechanical dishwashing resistance of utensils according to EN 12875-1 and 12875-2

125 testing cycles – testing cycle consist of:

- pre washing: 5 ± 0,5 minutes water circulation,
- washing: heating to 60°C while circulating the water and cleaning agent for 15 - 20 minutes,
- water circulation without heating: 10 ± 1 minutes,
- middle rinsing: water circulation for 3 ± 0,5 minutes,
- final rinsing: heating of the water to 65°C ± 2°C with water circulation,
- measuring when a temperature of (42± 2)°C has been reached and adding (4 ± 0,5) ml of rinse agent, measuring when a temperature of 65°C has been reached and draining the dishwasher by pump
- drying: for 10 ± 1 minutes by stream of hot air and for 30 ± 1 minutes by stream of air with room temperature.

These articles are repeated use articles which have been tested and validated as **microwave safe**. The testing method used is the resistance to microwave heating of ceramic, glass, glass – ceramic or plastics cookware according to EN 15284

Testing cycle consist of:

- Power of the microwave oven: 650 W
- Short heating time 1 min 51 s
- Long heating time 12 min
- Number of tested specimens 3 + 1 comparison sample

The information provided in this document is restricted to the stated articles delivered by Haval Disposables as it leaves its production facilities.

The information included in this document is valid from the stated version date until this document is superseded. Because of possible changes in the underlying legislation and regulations, as well as possible changes in our products, we cannot guarantee that the status of this document will remain unchanged. We, therefore recommend our customers to verify the regulatory status periodically. It will be renewed in all cases where the previous conformity is no longer ensured

In the name of Mr. E. v. Limpt

Position: Director

Date: 04-05-2023