

DECLARATION OF CONFORMITY

for materials and/or articles intended to come into contact with food

1. Identification of the introducing company:

Havi Oy, Kertakaari 5, 55120 Imatra, Finland

2. Identification of a product:

Knife, fork, spoon, coffee spoon

6411632552210 Ecotime puukuituhaarukka 50kpl/18cm

6411632551268 Ecotime puukuituveitsi 50kpl/18cm

6411632553316 Ecotime puukuituruokalusikka 50kpl/18cm

641162553725 Ecotime puukuitukahvilusikka 20x50kpl/12,5cm

6411632553750 Ecotime puukuituaterinsetti ve+ha+lii 500kpl

3. Identification of resources:

WPC composite – lignocellulose 40% + 60% PP

4. Date of declaration:

13.5.2025

5. Confirmation of conformity with requirements:

The abovementioned products are produced according to the rules of good manufacturing practice and do not cause penetration of their ingredients into the food in the amounts which may threaten human health or may result in unacceptable changes to food composition or worsening of its organoleptic qualities. The resources which are used for their manufacturing are intended to come into contact with food and fulfil all obligatory binding requirements of domestic and EU legal acts listed below, foreseen for this type of products, as amended:

- Commission Regulation (EC) no. 10/2011 of 14 January 2011 on materials and articles made of plastics intended to come into contact with food as amended until 2020/1245, on plastic materials and articles intended to come into contact with food.
- Commission Regulation (EC) no. 1935/2004 on materials and articles intended to come into contact with food and repealing directives 80/590/EEC and 89/109/EEC;
- Commission Regulation (EC) no. 2023/2006 on good manufacturing practice in relation to materials and articles intended to come into contact with food;
- Commission Regulation (EC) no. 1895/2005 of 18 November 2005 on limitation of use of some epoxy derivatives in materials and articles intended to come into contact with food;
- Act on food and feed safety (Journal of Laws 2010.136.914)/Commission Regulation (EC) no. 178/2002 Of European Parliament and European Council of 28 January 2002 establishing general rules and requirements of food law, establishing European Food Safety Office and establishing procedures within food safety (refers to materials and articles);
- REGULATION (EU) 2023/988 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC
- According to EUROPEAN PARLIAMENT AND COUNCIL DIRECTIVE 94/62/EC of 20 December 1994 on packaging and packaging waste, and polish regulation Act of 13 June 2013 on packaging and packaging waste management (Journal of Laws 2013.888);
- Regulation No. 1907/ 2006 of European Parliament and Council on registration, evaluation, authorisation and restriction of chemicals (REACH).

- REGULATION (EC) No 1333/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 December 2008 on food additives

6. Information on substances which are subject to limitations:

Regulation (EU) No 10/2011 contains an overall migration limit (OML) of 10 mg/dm², which applies to all food contact materials, except those intended for contact with food for infants and young children. Representative samples made of WPC composite were tested and did not exceed the OML. The migration tests performed covered contact with all types of food and the use condition OM3 (2 hours at 70°C) covering all food contact conditions that include hot filling and/or heating to a temperature T where 70°C ≤ T ≤ 100°C for a maximum of $t = 120/2^{((T-70)/10)}$ minutes, not followed by long-term storage at room temperature or in a refrigerator.

Simulant A,B, D2i, D2e were used for the tests.

Surface area of contact of the simulant: 1dm²/100ml

The results of the conducted global migration tests indicate that the products manufactured by us meet the requirements for products in contact with food specified in the Act, and the migration limits for individual tests do not exceed the maximum limit specified by law.

WPC composite products contain the following monomers, other starting substances, macromolecules obtained from microbiological fermentation, additives or auxiliary substances in the production of polymers with a specific migration limit (SML) in accordance with Commission Regulation (EU) 10/2011 with subsequent amendments.

FCM Number	CAS Number	Chemical name	Specific migration limit, SML (mg/kg food)
39090	70955-14-5	N,N-Bis(2-hydroxyethyl)alkyl(C8-C18)amin	SML = 1.20 mg/kg
39815	182121-12-6	9,9-bis(methoxymethyl) fluorene	SML = 0.05 mg/kg
-	7429-90-5	Aluminum	SML = 1.00 mg/kg
19960	108-31-6	Maleic anhydride	SML = 30.00 mg/kg

Dual Use Additives

WPC composite products may contain mono- and diglycerides of fatty acids (E471) and sodium benzoate (E211), which are permitted as food additives with restrictions in Regulation (EC) No 1333/2008 or as flavourings in Regulation (EC) No 1334/2008. Any other substances classified as dual-use additives are either not present in WPC composite products or are not subject to restrictions.

Non-intentionally added substances, NIAS.

Non-intentionally added substances are substances that are not intentionally used in the production process and whose continued presence is desired in the final product to ensure specific properties, appearance or quality.

WPC composite products have been assessed for the potential migration of NIAS in an accredited laboratory. All substances found have been assessed and, according to the findings, meet the requirements set out in Article 3 of the Framework Regulation (EC) 1935/2004.

The lignocellulose used for production comes from a certified FSC and PEFC source. GMOs are not intentionally present in our products.

7. Requirements related to the use of materials:

The abovementioned products, used properly and accordingly to their intent, are safe for human health and life. They may be used for contact with food, according to the specifications below:

- Kind of food which may be contacted by the material: all kinds of food;
- Time and temperature of laboratory analyses: 2h 70°C;
- Intended use: food consumption of warm and cold meals/drinks;
- Other comments/restrictions: multiple, short-term contact in temperatures from -15°C to +95°C. Our products are not applicable for freezing, heating and microwaving; this product has an indefinite shelf life;
- The tests carried out confirm the possibility of multiple use;
- Mechanical dishwashing resistance: 125 washing cycles;
- Products must be stored in temperatures of +10°C to +35°C;

Identification of the product forwarded to a client is possible with the information included on its packaging:

Date of production / Shift number/Identification no. of a packer

We hereby declare that the process of manufacturing of the abovementioned products does not include any alterations which may influence safety and the level of migration, as described in the already mentioned report on the analysis. All the information above is confirmed by the proper documentation and/or analysis data related to the products and resources, available upon request.

This declaration has been issued on the basis of the data available on the date of its issuing and according to Article 15 of the Order 10/2011. It shall be renewed if the composition or manufacturing process is altered significantly which influences safety and the level of migration and also whenever new regulations or scientific data are published which may be applicable for the materials or articles.

Havi Oy Riihimäki

Tuotepäällikkö
Elisa Helander