



To: Customer

Neuhaus, 26.10.2023

COMPLIANCE STATEMENT

Item(s): Cups for non-alcoholic hot drinks
Item code(s): 8 oz (0,2 l) / 10 oz (0,25 l) / 11 oz, 12 oz (0,3 l) / 16 oz (0,4 l)
SW Hotcups Flexo, various printed

The above-mentioned products are made of virgin fibers paperboard with coextruded polyethylene layer. We confirm you that these products are suitable to go in direct food contact on the non-printed surface with all kinds of fluid aqueous, non-alcoholic foodstuffs (intended purpose hot beverages) in the take-away service.

Legal Compliance:

- Product complies with Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food, modified by the Regulation (EU) No 2019/1381;
- Product complies with Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, modified by the Regulation (EU) No 2023/1442;
- Product complies with Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food (GMP), modified by the Regulation (EC) No 282/2008;
- Product complies with Directive (EC) No 94/62 on packaging and packaging waste, art.11, last amendment by Directive (EU) No 2018/852;
- Product complies with Foodstuffs, Consumer Goods and Animal Feed Code (Foodstuffs and Animal Feed Code - LFGB) in the version of the notification of 15 September 2021, last amendment on 20 December 2022, §30, 31;
- Paperboard complies with German Recommendation BfR XXXVI, paper and board for food contact, state of 01 February 2023;
- Printing inks comply with the requirements of the Swiss Ordinance of the EDI on Materials and Articles in Contact with Food (SR 817.023.21) of 16 December 2016, last amendment by the Ordinance of 15 October 2022;

SEDA GERMANY GmbH
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- Printing inks comply with the EuPIA Exclusion Policy and are formulated and manufactured in accordance with the " EuPIA Guideline on Printing Inks applied to the non-food contact surface of food packaging materials and articles". In addition, the inks are manufactured in accordance with the EuPIA "Good Manufacturing Practices for the Production of Packaging Inks formulated for use on the non-food contact surfaces of food packaging and articles intended to come into contact with food (GMP)";

Packaging Substances List

The side intended to go in contact with foodstuff is made of polyethylene layer. Based on the confirmation of our raw material supplier we confirm that the PE layer does not contain any monomers or additives with specific migration limit (SML) according to Regulation (EU) 10/2011.

Based on the confirmation of our raw material supplier we confirm that the extrusion coated paperboard may contain following substances with Dual Use Character (authorized as food additives by Regulation (EC) No 1333/2008 or as flavourings by Regulation (EC) No 1334/2008):

Substance	CAS - No	E - No
starch	65996-62-5	E 1404
propylene glycol	57-55-6	E1520
polyethylene glycol	25322-68-3	E1521
formic acid	64-18-6	E 236
sodium nitrate	7631-99-4	E 251
citric acid	77-92-9	E 330
dipic acid	124-04-9	E 355
sorbitan monolaurate	1338-39-2	E 493
magnesium chloride	7786-30-3	E 511
sulphuric acid	7664-93-9	E 513
sodium sulphate	7757-82-6	E 514
ammonium sulphate	7783-20-2	E 517



Substance	CAS - No	E - No
aluminum sulfate	10043-01-3	E 520
sodium hydroxide	1310-73-2	E 524
silicon dioxide	112926-00-8	E 551
silicon dioxide	7631-86-9	E 551
sodium lignosulfonate	8061-51-6	E 565
stearic acid	57-11-4	E 570
dimethyl silicones and siloxanes	63148-62-9	E 900

The list of monomers/additives which may be present in other packaging materials cannot be disclosed since is covered by confidentiality agreement between Seda and its suppliers.

Food Safety Testing

All food safety analysis have been performed on similar items representative of the product supplied (made of same raw materials and manufactured using same process) by accredited laboratory. The testing protocol was designed on the basis of declaration of our raw material suppliers', our manufacturing process and final food application.

Before carrying out the migration tests the above-mentioned products were stored in a pile for set-off (10 days at 40°C).

The overall migration result is below the law limit of 10 mg/dm², according to Regulation (EU) No 10/2011 article 12. The migration test was carried out by putting the food contact side in direct contact with the simulant under the following conditions:

Food Simulant	Test Conditions	S : V	Results [mg/dm ²]
acetic acid 3% (w/w)	2 h, 70°C	2,9 dm ² : 450 ml	< 2
ethanol 10% (v/v)	2 h, 70°C	2,9 dm ² : 450 ml	< 2
ethanol 95% (v/v)	4 h, 60°C	2,9 dm ² : 450 ml	< 2
isooctane	30 min, 40°C	2,9 dm ² : 450 ml	< 2

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According to Regulation (EU) 10/2011 annex V, table 3 (and the following amendment Regulation (EU) 2016/1416) test conditions stated above (2 h, 70°C) cover the following intended food contact: "Any food contact conditions that include hot-fill and/or heating up to 70 °C for up to 2 hours, or up to 100 °C for up to 15 minutes, which are not followed by long-term room temperature or refrigerated storage.

The above-mentioned products do not contain components with functional barrier properties.

The above statement is the result of the food safety studies based on the declarations of our raw material suppliers and migration analysis performed by accredited laboratory.

The above statement is valid and will be renewed in case of changes in the product formulation or in the regulations.

i.A. Dr. Katja Trenkenschuh
QA / SEDA Germany