

Declaration of Conformance for Food Contact Materials

Customer Information

Name:		Contact(s)	
Addresses:		Contact Details:	E-mail: Phone: Fax:
Invoice Description:		Date of Issue:	22.09.2023

1 Product: Paper Straw – Industrial Straws.

We can confirm that by independent testing or by a process of due diligence with our raw material suppliers, the following statements apply to the paper straws manufactured by Roda Packaging Ltd.

1.1 Packaging Material Description:

Paper Straw: Water based Flexographic coatings, virgin fibres straw paper, Synthetic Resin Dispersion adhesive.

Process: The straw is spiral wound using three or more layers of paper cut into various width ribbons, any coatings are applied onto the outer side of one layer of paper by flexographic technology or no coating is applied. Two or more surfaces of paper are coated with adhesive and wound around a mandrel to form the straw. A limited amount of pharmaceutical grade forming oil is applied to aid the forming process.

1.2 Intended Food Contact and Conditions of Use

Type of food: All cold drinks including carbonated and still drinks, milk-based drinks, fruit juice-based drinks and alcoholic drinks.

Condition of Use: Operating temperature range 0°C – 40°C. Not suitable for hot drinks.

The straw may be immersed in the beverage from either end, the beverage is sucked through from the other end in contact with the lips. During use the straw should not be chewed or undergo excessive force when stirring the beverage. The straws are tested in water directly from the manufacturing process for 30 minutes. After a minimum conditioning of 24 hours, the straw will maintain its integrity to allow a drink to be drawn through it for at least 3 hours.

Storage Conditions: -5°C – 40°C (temperature), RH < 90% (humidity).

Shelf life: considering the raw materials, it is estimated to be greater than 2 years stored according to the conditions above.

1.3 Product Construction

The following table identifies the different layers of the product.

Layer #	Thickness (µm)	Material Supplier	Comments
1	N/A	Pharmaceutical grade White oil	Used as Process Aid very small amount
2	300	120/145gsm Paper FSC Mix	
3	N/A	PVA Glue	Glue absorbs into paper
4	300	120/145gsm Paper FSC Mix	
5	N/A	PVA Glue	Glue absorbs into paper
6	150	60gsm Paper FSC Mix	
7	N/A	Outer protective Varnish over Ink – water-based food safe	Depends on product specification
8	27 or 40	Paper Overwrap – 25/40 gsm crimped or BOPP 2x15/20µm heat sealed	Depends on product specification

Paper suppliers are approved for use as food contact materials. The supplier approval information and the full traceability by supplied batch can be supplied.

The paper has no recycled paper content, but it is designated as FSC MIX which is defined by FSC as:

The FSC Mix label means the fibre within the product is from FSC-certified forests, or controlled wood.

While not FSC-certified, controlled wood cannot be:

- illegally harvested.
- harvested in violation of traditional and civil rights.
- harvested in forests where high conservation values are threatened.
- harvested in forests being converted to plantations or non-forest use.
- harvested in forests where genetically modified trees are planted.

The food contact compliance statements from all the suppliers can be requested as appendices to this document.

2 Legal Compliance

The following regulations are related to Food Safety. This information has been gathered from the raw material suppliers and the 3rd party Test house recommendations:

- Product complies with the Regulation 1935/2004/EC and Commission Regulation 2023/2006.
- Product complies with EC Regulation 10/2011 and regulation (EU) 1245/2020 with reference to the adhesive layer.
- Paperboard complies with German BfR recommendation XXXVI, September 2017 and following amendments and CEPI Guideline.
- Adhesive complies with the German BfR recommendation XIV, direct food contact.
- Printing inks and Varnish Coatings comply with the EuPIA Exclusion List. They are formulated and manufactured in accordance with the "Guidelines for printing EuPIA external food packaging."
- Printing inks and Varnish coatings: Swiss Ordinance - in direct contact with the foodstuff are explicitly excluded from the scope of this National legislation (see Section 8b Packaging Inks – Scope. Article 26e, 2a). Printed inks are covered with a food safe varnish.
- French Loi n° 2010-729 du 30 Juin 2010 modifiée par la loi n° 2012-1442 du 24 décembre 2012.
- Dutch Warenwetregeling Verpakkingen en Gebruiksartikelen 2.2.1 Bijlage Deel A, Hoofdstuk II (paper and board).
- DG CCRF for paper and Cardboard – latest revision
<https://www.economie.gouv.fr/dgccrf/papiers-et-cartons>.
- The Product Complies with Italian DM 21/03/73.
- Product complies with the Regulation 94/62/CE (amended by 12/2004 e 20/2005). Packaging and Packaging Waste.
- Product complies with the Regulation TPCH of CONEG.
- Product complies to Denmark Order No. 681 of May 25, 2020.

2.1 Overall migration:

Overall migration analyses on the finished product are conducted as per EU Regulation 10/2011 and Italian D.M. 21/3/73 and following amendments, in various food simulants:

Simulant	Limit	Result
A (distilled water),	10 mg/dm ²	< 10 mg/dm ²
B (acetic acid 3% w/v),	10mg/dm ²	< 10 mg/dm ²
D1 (ethanol 50% v/v) and	10mg/dm ²	< 10 mg/dm ²

Test conditions: the migration test was carried out by putting the straw in direct contact with the simulant under the following conditions: contact time 1 hour at 40° C total immersion.

2.1.1 Evaluation of migration results:

The straw was found to comply with the overall and specific migration limits reported in Reg. EU 10/2011 and Italian D.M. 21.03.73 and any following modifications. The following is taken directly from the test report the full test report and results are available on request.

During the extensive product testing the following substances were assessed and judged to be compliant with National or Customer requirements:

- Antimicrobial substances.
- Diisononyl phthalate (DINP).
- Pentachlorophenol (PCP) Content. Concentration <= 0.15mg/kg.
- Heavy Metals including
 - o Cd (Cadmium), Hg (Mercury) Concentration <= 0.002mg/dm²
 - o Pb (Lead) Concentration <= 0.003mg/dm²
 - o CrIII (Tri Chrome), CrVI (Hex Chrome), Concentration <= 10mg/kg.
- Aromatic Amines.
- Formaldehyde.
- Glyoxal.
- Benzophenone.
- DCP and 3-MDCP.
- Ethylenimine.
- Isothiazolinone; MIT, CMI, BIT, OIT.
- Bisphenol A (BPA), BADGE, BFDGE, NOGE.
- Hydrocarbons (MOSH, MOAH).
- Phthalates.
- Polycyclic Aromatic Hydrocarbons (PAH).
- Toxicological Risk.
- Migration of BA, CO, MN, ZN, CU, FE, LI, AL, NI.
- Fluorinated substances including PFOA, PFOS, PFAS.
- PVC and PVDC.
- Optical brighteners are not used in any materials.

2.2 Dual Use Additives and NIAS

After due consideration of the supplier documentation, we can confirm:

- Our products do not have any Dual Use additives.
- Our products do not contain any NIAS (Non-Intentionally Added Substances).

2.3 NIAS (Non-Intentionally Added Substances)

- In summer 2015, the International Life Sciences Institute (ILSI) published the "Guidance on the Best Practices on the Risk Assessment of Non-Intentionally Added Substances (NIAS) in Food Contact Materials and Articles." This was the first guidance to provide recommendations for assessing the safety of NIAS in all FCMs. The document also provided a practical solution for

assessing the safety of intentionally added substances (IAS). IAS consist of known ingredients having regulated safety properties.

- NIAS, as defined in the ILSI guidance, are either impurities present in a substance, a reaction intermediate formed during the production process or a decomposition/reaction product. In addition, certain contaminants are also considered to be NIAS. The ILSI guidance gives several examples of IAS and NIAS for different FCMs.
- Raw materials and chemicals added in the papermaking process may contain both IAS and NIAS. Examples of IAS are cellulose fibres, including their natural constituents and residual monomers in polymers. NIAS could be, for example, hydrolysis products.
- Non-intentionally added shall mean substances not deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristics, appearance, or quality. For example, this can include impurities, degradation products and reaction products.
- After due consideration of our suppliers' documentation, we can confirm that our products do not contain any NIAS.

2.4 Irradiation and Radiological Sources.

To the best of our knowledge and from the information provided from our suppliers, our FCM products are not exposed to any type of radiation, included high-energy-ionizing radiations, or undergo any radiological influences during production.

No raw materials have been irradiated or exposed to any radiological sources.

3 US Legislation - FDA, Prop 65, etc

Supplier Statement on FDA compliance.

Considerations were made to the FDA requirements for each part of the product.

Paper suppliers declare that the material supplied to us comply with US Food, Drug and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR, part. 176.170 and 176.180.

Adhesive supplier declares that the material supplied to us comply with US Food, Drug and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR, part. 175.105 (adhesives).

Forming oil supplier declares that the material supplied to us comply with US Food, Drug and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR, part. 178.3620(a) white mineral oil.

Varnish Coatings supplier declares that the material supplied to us comply with US Food, Drugs and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR 176.170 'Contact with Paper', 21 CFR 176.180 'Paper and Board in Contact with Dry Food.'

3.1 1986 California Proposition 65

In consultation with our suppliers, we have considered the raw materials used in making our products in relation to the latest published **Proposition 65 List** which can be found from <https://oehha.ca.gov/proposition-65/proposition-65-list>.

From assessment and discussion with our suppliers our Products do not knowingly contain any of the substances on the Proposition 65 List.

Any updates to the list are check at least annually during the Management review to identify if any disclosure is required.

4 Coating Analysis

The identification of volatile, semi-volatile compounds and any photo initiators that may come from packaging materials, including system inks or varnish coatings, have been evaluated by a certified laboratory.

A variety of standard test methods were used as specified in the standard requirements already referenced by this document including but not limited to DM, BFR, EU, FDA regulations.

No compounds detected in concentrations above the requirements of the regulations.

5 Registration, Evaluation, Authorisation & Restriction of Chemicals – (REACH)

The purpose of REACH is to improve the health of EU workers who are exposed to hazardous substances. This is achieved by requiring the provision of appropriate information on the hazards posed by these substances and what measures should be taken to safeguard workers using these substances.

The REACH regulation (Regulation (EC/1907/2006) places specific requirements on all businesses.

Roda Packaging Ltd can confirm there are no SVHCs (Substances of Very High Concern) present in our products in concentrations greater than 0.1% weight by weight. The SVHC list will be reviewed after each new issue and if any substances are found to be present, we will inform our customers.

6 Allergen Statement

Our products do not knowingly contain substances or products causing allergies or intolerances listed in Annex II to Regulation (EU) No 1169/2011 as part of the formulations, namely: cereals containing gluten, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, sulphur dioxide and sulphites, lupin, molluscs.

Halal / Kosher / Vegan

The products given above do not contain components of animal origin as part of the formulations, only industrially manufactured chemicals. But checking the presence of substances of animal origin is not part of our quality assurance measurements. Our products are not halal / kosher certified.

7 Outer Packaging Legal Compliance

The straws are wrapped in heat sealed flow wrap materials in the form of a continuous bandolier the bandolier material may consist of (all packaging materials are approved for food contact):

- BOPP – Biaxially Oriented Poly Propylene
- Paper / LDPE – Paper with Low Density PE

8 Site Certification

The Roda Packaging Site currently holds the following Industry certifications:

- BRC Packaging Issue 6 – “AA” Grade. Cert. No.: 12 021 61151 TMS. 19/09/2022 ~ 12/11/2023.
- FSC – Registration Code: BV-COC-155682, 19/03/2020~18/03/2025.
- ISO9001:2015: - Certificate Number SL23363Q. 17/02/2020 ~ 16/02/2026
- HACCP – Cert. No. 2023BEO003. 17/02/2020 ~ 16/02/2026.


9 General

The analysis of the requirements listed supported by the supplier and independent testing of the finished product, we have our duty of care regarding the compliance of the product we supply.

The product is intended for cold or ambient drinking use not for hot drink use. It is the responsibility of the user to verify its suitability for his own intended food application.

This is intended for your company only and replaces any previous Certificates of Compliance.

It is valid only when signed by us. After a break in delivery lasting more than 12 months, this letter ceases to be valid for new deliveries of the relevant product.

Name:	Strahinja Kočijašević	Signature / Date:  03.03.2023
Company Position:	Quality Assurance Director	
Contact Details	T: / M: +381 69 8085075 E: strahinja.kocijasevic@rodapackaging.com	