



DECLARATION of COMPLIANCE

Kraft Paper Lid-Double Side PE Coated

We hereby confirm that the products we supply to you do meet the requirements put forward in the legal framework presented below.

1. DESCRIPTION OF MATERIALS AND ARTICLES

Paper Lids

Products are made of paperboard with double side PE coated lamination.

Substance Name	CAS Number	E Number
Polyethylene	9002-88-4	926-220-5

2. INTENDED USES

Products listed above can be in contact with following food stuff:

All beverages and all food types

In following conditions of temperature and time*:

Fill (Up to 40°C for up to 30 min) (Up to 70°C for up to 2 hours)

* It is the obligation of the recipient of this declaration to ensure that the packaging is suitable for aimed processing and downstream use circumstances.

Recommended service temperature (-)0 degC- (+)70 degC.

The product meets the above requirements and poses no threat to human health provided that use it as intended.

3. LEGISLATION

We certify that these products fulfil the requirements on products intended for use in contact with food and packaging waste as described in:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (07.08.2009) and its amendments up to date of this document
- Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food (17.04.2008) and articles intended to come into contact with food and its amendments up to date of this statement
- Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, and its amendments up to Regulation (EU) 2025/351.
- Regulation (EU) 2016/1416 of 24 August 2016 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food
- Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food
- Commission Regulation (EU) 2017/752 of 28 April 2017 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with Food
- EuPIA Guideline on printing inks applied to non-food contact surface of food packaging materials and articles,
- Commission Regulation (EU) 2022/1616 of 15 September 2022 on recycled plastic materials and articles intended to come into contact with foods, and repealing Regulation (EC) No 282/2008, and its amendments up to date of this statement.



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- Commission Regulation (EU) 2023/1442 of 11 July 2023 amending Annex I to Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, as regards changes to substance authorisations and addition of new substances
- Commission Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles
- Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers.(Annex II)
- Federal Institute for Risk Assessment BfR XXXVI, Paper and Board for food contact.
- Commission Regulation (EU) 2024/3190 of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213
- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC
- Turkish Food Codex Food Labeling and Consumer Information Regulation (O.N. 29960/26.01.2017) and its amendments up to date of this statement
- Property of Materials and Food Contact Regulation on Good Manufacturing Practice and Registration Procedures (O.N. 28373/03.08.2012)- (O.N: 28547/02.02.2013) and its amendments up to date of this statement
- Veterinary Services, Plant Health, Food and Feed Law (O.N. 27610/13.06.2010) - (O.N: 30616/5.12.2018) and its amendments up to date of this statement
- Regulation on Food Hygiene (O.N. 28145/17.12.2011) and its amendments up to date of this statement
- Regulation on plastic materials and articles intended to come into contact with food (2019/44) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Regulation on the list of simulants used in migration test of plastic materials and articles intended to come into contact with food (2019/43) (O.N. 30989/25.12.2019) and its amendments up to date of this statement
- Turkish Food Codex Regulation on Substances and Materials in contact with food (R.G. 30680 / 8.2.2019) and its amendments up to date of this statement
- Regulation on Registration and Approval Procedures of Food Businesses (R.G. 30825 / 08.07.2019) and its amendments up to date of this statement
- The Regulation of Waste Control of Food Contact Materials
- Turkish Food Codex Plastic Materials In Contact With Food And Amendment To Materials Notification (Notification No: 2019/44) Notification On The Implementation Of (2023/33) (O.N. 32538/06.05.2024)

4. ANALYSES

According to Turkish Food Codex and Regulation (EU) No 10/2011 materials and articles shall not transfer their constituents to foodstuffs in quantities exceeding 10 mg per dm² (60 mg/kg) foodstuff or food simulant (limiting value of overall migration) and specific migration limits shown below as mg/kg.

Following migration tests were conducted:

DETERMINATION of OVERALL MIGRATION						
FOOD TYPE	SIMULANT	TIME (h)	TEMP. (°C)	METHOD	LOQ* (mg/kg)	REQUIREMENT
Acidic Food	Food Simulant B, Acetic Acid 3%	2	70	EN 1186-1 EN 1186-3	20	<=60 mg/kg
Aqueous Food	Food Simulant A, Ethanol 10%	2	70	EN 1186-1 EN 1186-3	20	<=60 mg/kg
Alternative Simulant for fatty Food Simulant	Fatty Food Simulant, Ethanol 95%	2	60	EN 1186-1 EN 1186-3	20	<=60 mg/kg



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Fatty Food Substituted Simulation	Isooctane	30 min.	40	EN 1186-1 EN 1186-3	20	<=60 mg/kg
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DETERMINATION of SPECIFIC MIGRATION							
SUBSTANCE	CAS Number	SIMULANT	TIME (h)	TEMP. (°C)	SML REQUIREMENT (mg/kg)	METHOD	DETECTION LIMIT (mg/kg)
Manganase (Mn)	7439-96-5	Acetic acid 3%	2h	70	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Copper (Cu)	7440-50-8	Acetic acid 3%	2h	70	5 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Cobalt (Co)	7440-48-4	Acetic acid 3%	2h	70	0.05 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Lithium (Li)	7439-93-2	Acetic acid 3%	2h	70	0.6 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Zinc (Zn)	7440-66-6	Acetic acid 3%	2h	70	5 (max.)	EN 13130-1 ISO 17294-1&2	0.010
Barium (Ba)	7440-39-3	Acetic acid 3%	2h	70	1 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Iron (Fe)	7439-89-6	Acetic acid 3%	2h	70	48 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Aluminum (Al)	7429-90-5	Acetic acid 3%	2h	70	1 (max.)	EN 13130-1 ISO 17294-1&2	0.008
Nickel (Ni)	7440-02-0	Acetic acid 3%	2h	70	0.02 (max.)	EN 13130-1 ISO 17294-1&2	0.007
Antimony (Sb)	7440-36-0	Acetic acid 3%	2h	70	0.04 (max.)	EN 13130-1 ISO 17294-1&2	0.005
Arsenic (As)	7440-38-2	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.002
Cadmium (Cd)	7440-43-9	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Lead (Pb)	7439-92-1	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Mercury (Hg)	7439-97-6	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Europium (Eu)	7440-53-1	Acetic acid 3%	2h	70	0.05 sum (max.)	EN 13130-1 ISO 17294-1&2	0.005
Gadolinium (Gd)	7440-54-2	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Lanthanum (La)	7439-91-0	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Terbium (Tb)	7440-27-9	Acetic acid 3%	2h	70		EN 13130-1 ISO 17294-1&2	0.005
Chromium (Cr)#	7440-47-3	Acetic acid 3%	2h	70	ND	EN 13130-1 ISO 17294-1&2	0.01
Calcium (Ca)	7440-70-2	Acetic acid 3%	2h	70	Quantum Satis	EN 13130-1 ISO 17294-1&2	0.01
Potassium (K)	7440-09-7	Acetic acid 3%	2h	70	Quantum Satis	EN 13130-1 ISO 17294-1&2	0.01
Magnesium (Mg)	7439-95-4	Acetic acid 3%	2h	70	Quantum Satis	EN 13130-1 ISO 17294-1&2	0.01
Sodium (Na)	7440-23-5	Acetic acid 3%	2h	70	Quantum Satis	EN 13130-1 ISO 17294-1&2	0.01

ND = Not detected

= When migration of total chromium is between 0.01 mg/kg and 3.6 mg/kg, chromium (VI) content in plastic shall be not detected.

ANALYSIS NAME	CAS Number	TIME (h)	TEMP. (°C)	METHOD	LOQ*	REQUIREMENT
Determination of Bisphenol A Migration, Aqueous Food Simulant	80-05-7 FCM No: 151	2	70	CEN/TS 13130-13 BS EN 14372 EN 14350-2	0.01 mg/kg	<= 0,05 mg/kg
Butyl Benzyl Phthalate (BBP) Phthalatec Acid Benzyl butyl ester	85-68-7 FCM No: 159	-	-	EN 14372	0.002 %	<= 0,1 %



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Di-n-Butyl Phthalate (DBP)	84-74-2 FCM No: 157	-	-	EN 14372	0.002 %	<= 0,05 %
Di(Ethylhexyl) Phthalate (DEHP)	117-81-7 FCM No: 283	-	-	EN 14372	0.001 %	<= 0,1 %
Di-Iso-Nonyl Phthalate (DINP)	28553-12-0 FCM No: 728	-	-	EN 14372	0.022 %	<= 0,1 %
Di-Isodecyl Phthalate (DIDP)	26761-40-0 FCM No: 729	-	-	EN 14372	0.015 %	<= 0,1 %
Sensory Analysis	-	-	-	DIN 10955	-	<= 2

* LOQ: Limit of Quantification

SPECIFIC MIGRATION of PRIMARY AROMATIC AMINES (PAA)							
COMPOUND	CAS Number	SIMULANT	TIME (h)	TEMP. (°C)	METHOD	DETECTION LIMIT (mg/kg)	REQUIREMENT (mg/kg)
4-Aminodiphenyl	92-67-1	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
Benzidine	92-87-5	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4-Chloro-o-toluidine	95-69-2	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
2-Naphthylamine	91-59-8	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
o-Aminoazotoluene	97-56-3	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
5-Nitro-o-toluidine	99-55-8	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4-Chloroaniline	106-47-8	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
2,4-Diaminoanisol	615-05-4	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4,4'-Diaminodiphenylmethan	101-77-9	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
3,3'-Dichlorobenzidine	91-94-1	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
3,3'-Dimethoxybenzidine	119-90-4	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
3,3'-Dimethylbenzidine	119-93-7	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
3,3'-Dimethyl-4,4'-diaminodiphenylmethan	838-88-0	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
p-Cresidine	120-71-8	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4,4'-Methylen-bis-(2-chloroaniline)	101-14-4	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4,4'-Oxydianiline	101-80-4	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4,4'-Thiodianiline	139-65-1	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
o-Toluidine	95-53-4	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
2,4-Toluylenediamine	95-80-7	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
2,4,5-Trimethylaniline	137-17-7	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
2-Methoxyaniline	90-04-0	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
4-Aminoazobenzene	60-09-3	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND
m-Phenylendiamine	108-45-2	Acetic acid 3%	2	70	EN24815 EN2011	0.002	ND



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Benzoguanamin	91-76-9	Acetic acid 3%	2	70	EN24815 EN2011	0.002	5
4,4'-Methylenebis(3-chloro-2,6-diethylaniline)	106246-33-7	Acetic acid 3%	2	70	EN24815 EN2011	0.005	0.05
Primary aromatic amines(other)	-	Acetic acid 3%	2	70	EN24815 EN2011	0.005	0.01

Analysis Name: Specific migration of Primary Aromatic Amines (**PAA**)

Requirement: Commission Regulation (EU) No. 10/2011 and its amendments and JRC Technical Guidelines EN24815 EN2011, By Liquid Chromatograph Tandem Mass Spectrometry (LC-MS/MS) Analysis.

Remark: **ND** = Not detected

5. ABSENCE OF SUBSTANCES (For Polyethylene)

Furthermore, we confirm that this compound is manufactured without the intentional use of the following substances:

ABSENCE OF SUBSTANCES	CAS NO
Acrylamide	79-06-1
Allergens (annex II Regulation 1169/2011)	-
Alkylphenol ethoxylates (APEO)	-
Primary aromatic amines	-
Arsenic and arsenic compounds	CAS number cannot be referred as there are many different compounds
Asbestos	-
Azoic colorants	-
Benzene	-
Benzophenone , hydroxybenzophenone and 4-methylbenzophenone	119-61-9/134-84-9
Biocides	
Bisphenol A (BPA)	80-05-7
Bisphenol B (BPB)	77-40-7
Bisphenol F (BPF)	620-92-8
Bisphenol S (BPS)	80-09-1
Boron and boron compounds	7440-42-8
Cadmium Cadmium compounds	7440-43-9 CAS number cannot be referred as there are many different compounds
CFC (chlorofluorocarbons)y HCFC (hydrochlorofluorocarbons)	CAS number cannot be referred as there are many different compounds
CMR substances class 1A and 1B (Carcinogens, Mutagens and Reprotoxics) according with Regulation CLP (1272/2008)	-
Diethylhexyl adipate (DEHA)	103-23-1
Dimethyl fumarate (DMF)	624-49-7
Dioxines	CAS number cannot be referred as there are many different compounds
Epichlorohydrin	106-89-8
N-Ethyl o-Toluensulfonamide and N-Ethyl p-Toluensulfonamide (NETSA)	8047-99-2
Flame retardants: organic brominated compounds(pentabromodiphenyl ether, octabromodiphenyl ether...), antimony compounds, chlorinated paraffins, triaryl phosphates...	58965-66-5
Formaldehyde	50-00-0
Formamide	75-12-7
Halogens and halogenated compounds	CAS group number VIIA



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Hexavalent Chromium and hexavalent chromium compounds	18540-29-9
Isopropylthioxantone (ITX)	83846-86-0
Latex	9006-04-6
Lead and lead compounds	-
Lindane	58-89-9
Melamine	108-78-1
Mercury Mercury compounds	7439-97-6 CAS number cannot be referred as there are many different compounds
Elastomers or rubber from which n-nitrosamines may be released N-Nitroso-di-benzylamine (NDBzA) N-nitrosodibutylamine (NDBA) N-nitrosodiethanolamine (NDELA) N-Nitrosodiethylamine (NDEA) N-Nitrosodiisobutylamine (NDiBA) 3,5,5-trimetil-N-nitroso-N- (3,5,5-trimetilheksil) -1-heksanamin (NDİNA) N-Nitrodiisopropylamine (NDİPA) N-Nitrosodimethylamine (NDMA) N-Nitrosodi-n-propylamine (NDPA) N-Nitrosomorpholine (NMOR) N-Nitrosoethylphenylamine (NEPhA) N-Nitroso-N-methylaniline (NMPHA) N-Nitrosopiperidine (NPIP) N-Nitrosodiethanolamine (NDELA)	5336-53-8 924-16-3 1116-54-7 55-18-5 997-95-5 1207995-62-7 601-77-4 62-75-9 621-64-7 59-89-2 612-64-6 614-00-6 100-75-4 1116-54-7
Nitrofural / Nitrofurazone	59-87-0
Nyckel Nyckel compounds	7440-02-0 -
Nonylphenol,nonylphenol ethoxylate and cement	-
Organostannic /Organotin compounds	-
Parabenes (esters of p-hydroxybenzoic acid)	CAS number cannot be referred as there are many different compounds
PBT Substances (Persistent, Bioaccumulating and Toxics) and vPvB (very persistents and very bioaccumulating)	-
Pentachlorophenol and its salts and ester	87-86-5 CAS number cannot be referred as there are many different compounds
Phenol	108-95-2
Perfluorooctanoic acid (PFOA) and Perfluorooctane sulfonates (PFOS)	335-671/1763-23-1
Polycyclic aromatic hydrocarbons (PAH): Anthracene Fluoranthene Naphthalene Pyrene Benzoanthracene benzofluoranthene...	120-12-7 20-44-0 91-20-3 129-00-0 56-55-3 207-08-9
Solvents: Dichloromethane, Dimethylacetamide, Dimethylformamide 2-ethoxy ethanol Nitrobenzene Trichloroethylene Trichlorobenzene Trichloromethane Hexachlorobenzene...	75-09-2 127-19-5 68-12-2 110-80-5 98-95-3 79-01-6 CAS number cannot be referred as there are many different compounds 67-66-3 118-74-1



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Styrene and Polystyrene	100-42-5/9003-53-6
Thiuram	CAS number cannot be referred as there are many different compounds
Toluene	108-88-3
Triclosan	3380-34-5
Vinyl chloride monomer (VCM) its polymers (PVC...)	75-01-4 CAS number cannot be referred as there are many different compounds

6. DUAL USE ADDITIVES

Substances also authorised as direct food additives ("Dual use additives") are either not used for the manufacturing of this product, kind of not migrating, or only present in quantities that in case of their migration don't allow relevant contribution to exceed of the limits as set in the applicable food legislation.

7. TRACEABILITY

This can be done by referring to traceability by Box Label.

Box Label: Product Code, Product Description, Production Date

This certificate is valid until there is significant changes in the composition or production that bring about changes in the migration from the materials or articles or when new scientific data becomes available.

GENERAL MANAGER

LEVENT GÖNCAY

