



Declaration of Compliance acc. to article 15 and annex IV of Regulation (EU) no. 10/2011

This document is a declaration of compliance within the meaning of Regulation (EU) No 10/2011 on materials and articles intended to come into contact with food.

Company issuing the declaration in its role as importer or wholesaler or distributor

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New products: CIRC NETTE MEHRWEG made of polypropylene homopolymer, furthermore the product "ice cream cup, sushi box, pizza box"

Articles:

- Ice cream cups 150 ml, 250 ml, 480 ml, highly transparent frosted, including matching dome lids highly transparent,
- Sushi boxes S, M, L, container black, with matching lids highly transparent
- Pizza Box, Ø 33 cm, container slate grey, with matching lids highly transparent

Date of declaration:

16.05.2024 - Version V1

"Ice cream cup, sushi box, pizza box" have been manufactured using only monomers, other starting materials and additives authorised under the Plastics Regulation (EU) No 10/2011.

"Ice cream cup, sushi box, pizza box" are compliant with the following legislation:

- Articles 3, 11(5), 15 and 17 of Regulation (EC) No 1935/2004 - Framework Regulation,
- Regulation (EC) No 2023/2006 - Good Manufacturing Practice,
- Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food, consolidated version including Regulation (EU) No. 2023/1627 of 10.08.2023,

Page -2-

- Regulation of Swiss EDI no. 817.023.21 on materials and articles intended to come into contact with food,
- Resolution AP(89)1 on the use of colourants in plastics in contact with food,
- Directive (EC) No 94/62, Packaging Directive,
- EN 13429:2004 - Packaging - Reuse,
- EN 13430:2004 - Requirements for packaging recoverable by material recycling,
- EN 13431:2004 - Packaging - Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value,
- The used polypropylene homopolymer is also compliant with US FDA Regulation 21 CFR 177.1520 (a)(3)(i) and (c)3.2a for olefin polymers.

NLS, NIAS determination and risk assessment according to Art. 19 of Regulation (EU) No 10/2011

In order to determine

- intentionally added substances, not-listed in the Union list of Regulation (EU) no. 10/2011 (NLS) and
- not-intentionally added substances (NIAS)

Nette GmbH have performed a screening 10 days at 60°C in 95% v/v ethanol followed by a risk assessment acc. to Article 19 of Regulation (EU) no. 10/2011.

Results of the screening after the third migration and of risk assessment:

Substance	CAS no.	max. migration during screening in mg/kg food	type of substance	Restriction in mg/kg food
n-Hexadecanoic acid	57-10-3	0,09	FCM no. 105	60
Irgafos 168	31570-04-4	0,45	FCM no. 671	60
Irgafos 168 ox	95906-11-9	0,20	NIAS	60
Octadecanoic acid	57-11-4	0,11	FCM no. 106	60
2-4-di-tert-butylphenol	96-76-4	0,01	CH-ID no. 248	1 [1]
1-Tetradecanamine, N,N-dimethyl-	112-75-4	0,08	CH-ID no. 590	10 [2]
Ethyl palmitate	628-97-7	0,07	FCM no. 879	60
Benzene propanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, ethyl ester	36294-24-3	0,06	NIAS	0,1 [1]
Ethyl stearate	111-61-5	0,07	FCM no. 879	60
Monopalmitin isomer	23470-00-0	0,19	FCM no. 9	60
Monostearin isomer	123-94-4	0,16	FCM no. 9	60
Benzyl stearate	5531-65-7	0,01	NIAS	1,8 [3]
Branched/aliphatic hydrocarbons		3,87	oligomers	See monomer propene

[1] self-derived SML via NOAEL, [2] self-derived SML via NOEL, [3] Cramer Class I

Page -3-

Assuming the default assumption of a body weight of 60 kg the consumption of more than 10 kg of food per day can be considered as safe. The separately performed risk assessment for the black sushi containers came to the same result.

Overall migration for reuse application

We confirm that the Overall Migration Limit OML acc. to Art. 12 of Regulation (EU) No. 10/2011 of 10 mg/dm² is being met for reuse application (Annex V of Regulation 10/2011, no. 3.3.2.), e. g. overall migration is stable.

Test conditions for ice cream cups:

OM3

2 hours at 70°C with acetic acid 3 % w/v

2 hours at 60°C with Ethanol 95 % v/v

30 minutes at 40°C with iso-octane

Results

for ice cream cups

Material no.	Mat. 1					
Migration ratio	250 ml / 1.59 dm ²					
Parameter	Unit	RL	1 st Migration Result	2 nd Migration Result	3 rd Migration Result	Limit
Acetic acid 3 %	mg/dm ²	2	<RL	<RL	<RL	10
Ethanol 95 %	mg/dm ²	2	<RL	<RL	<RL	10
Isooctane	mg/dm ²	2	<RL	<RL	<RL	10

Test conditions for sushi boxes, pizza boxes:

OM2

10 days at 40°C with acetic acid 3 % w/v

10 days at 40°C with ethanol 95 % v/v

2 days at 20°C with iso-octane

Results

For sushi boxes, pizza boxes

Material no.	Mat. 1					
Migration ratio	455 ml / 4.52 dm ²					
Parameter	Unit	RL	1 st Migration Result	2 nd Migration Result	3 rd Migration Result	Limit
Acetic acid 3 %	mg/dm ²	2	<RL	<RL	<RL	10
Ethanol 95 %	mg/dm ²	2	<RL	<RL	<RL	10
Isooctane	mg/dm ²	2	2	<RL	<RL	10

Page -4-

Organoleptic properties - odour and taste

"Ice cream cup, sushi box, pizza box" do not lead to any perceptible odour or taste deviations in food.

Test conditions (ISO 13302) in water:

Ice cream cups: 2h, 70°C

Sushi boxes, pizza boxes: 10d, 40°C

Results for all items: No discernible deviations (score 0)

As a precaution, we would like to point out that multiple use of the "product" with food may result in odour and taste deviations.

Colour resistance Sushi box, Pizza box

Sushi boxes or pizza boxes do not release any colourants into food.

Test conditions: Resolution AP(89)1, tested with water, 3% w/v acetic acid, ethanol 50% v/v, vegetable oil, for all articles.

Substances with specific migration limit SML or SML(T)

"Ice cream cup, sushi box, pizza box" are not containing intentionally added substances with restrictions in Annex I of the Plastics Regulation (EU) No. 10/2011

Metals

"Ice cream cup, sushi box, pizza box" do not contain any detectable restricted substances in Annex II of the Plastics Regulation (EU) No. 10/2011.

Metal screening with acetic acid 3 w/v, test conditions:

Ice cream cups: 2h, 70°C

Sushi boxes, pizza boxes: 10d, 40°C

The detection limits of the metals listed in Annex II are undercut.

Dual Use Substances

The polypropylene homopolymer does not contain any dual use substances according to Regulation (EC) No 1333/2008 or according to Regulation (EC) No 1334/2008.

The dyes used may contain E171, titanium dioxide.



Page -5-

Specification for the use of “ice cream cup, sushi box, pizza box” by the end user.

Ice cream cups

All kinds of food.

Any food contact conditions that include hot-fill and/or heating up to a temperature of 70°C lasting a maximum of 2 hours or 100°C with a maximum of 15 minutes, which are not followed by long-term room temperature or refrigerated storage.

Microwave safe. However, do not zap pure fat or chocolate glazing in the microwave.

Dishwasher-safe.

Suitable for freezer.

Sushi boxes, pizza boxes

All kinds of food.

Any long-term storage at room temperature or below, including when packaged under hot-fill conditions, and/or heating up to a temperature of 70°C lasting a maximum of 2 hours or 100°C with a maximum of 15 minutes.

Microwave safe. However, do not zap pure fat or chocolate glazing in the microwave.

Dishwasher-safe.

Suitable for freezer.

The submission of this declaration serves to fulfill the obligation under Regulation (EU) No 10/2011 and does not constitute a warranty and/or guarantee for the product characteristics. The declaration for the “Product” is valid for member states of EU, for UK, Norway, Iceland, Liechtenstein and for Switzerland.

Nette GmbH have the obligation to issue a new declaration of conformity as soon as

- there has been a change of material characteristics of the “Product” or
- there are new results of migration testing or
- there has been a change in our manufacturing process or
- there are new legal rules or scientific principles available.



Page -6-

Changes/additions compared to version 1 will be marked in **colour**.

A declaration of compliance is mandatory for the distributor. Acc. to Article 16 of Regulation (EU) no. 10/2011 supporting documents including results of migration testing will be available only to our national competent authorities on request.

If you have any question, please contact Nette GmbH, www.nette-deutschland.de.

Göttingen, 16.05.2024

Signature