



## Declaration of Compliance in accordance with Article 15 and annex IV of Regulation (EU) no. 10/2011

This document is a declaration of conformity 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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**Product: CIRC NETTE MEHRWEG (REUSABLE) made of polypropylene homopolymer:**  
**All items listed in product list as per appendix 1. Together "all products"**  
Product list see Appendix 1

**Date of the declaration:**  
06.01.2026 – Version 1

"**All products**" have been manufactured exclusively using monomers, other starting materials and additives that are authorised in accordance with the Plastics Regulation (EU) No. 10/2011.

### "All products" – see Appendix 1 – comply with the following legal provisions:

- Articles 3, 11(5), 15 und 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 2024/3190 on the restriction of bisphenol A. Neither our suppliers nor we intentionally add bisphenol A or its derivatives to "**all products**".



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With regard to the 19th amendment (EU) No. 2025/351 to Regulation (EU) No. 10/2011, we would like to inform you that our suppliers and we are making use of the transition period until 16 September 2026.

- France: Law No. 2012-1442 bisphenol A
- Germany: LFGB of 19 June 2020, Sections 30, 31.
- EDI Regulation No. 817.023.21 on materials and articles intended to come into contact with foodstuffs,
- Resolution AP(89)1 on the use of colouring agents in plastics intended to come into contact with foodstuffs,
- AfPS GS 2019:01 regarding the content of polycyclic aromatic hydrocarbons. The concentration of PAHs is below the analytical detection limit.
- Directive (EC) No. 94/62 Packaging Directive,
- EN 13429:2004 - Packaging – Reuse,
- EN 13430:2004 - Requirements for packaging for material recycling,
- EN 13431:2004 - - Packaging - Requirements for packaging for energy recovery, including specification of a minimum calorific value,
- The polypropylene homopolymer also complies with US FDA Regulation 21 CFR 177.1520 (a)(3)(i) and (c)3.2a for olefin polymers.

### **NLS and NIAS determination and risk assessment in accordance with Art. 19 of Regulation (EU) no. 10/2011**

Nette GmbH has determined

- intentionally added substances, not-listed in the Annex I, the so-called Union list of Regulation (EU) no. 10/2011 (NLS) and
- unintentionally introduced reaction intermediates, degradation or reaction products (NIAS)

a screening test at 60°C in 95% ethanol for 10 days, followed by a risk assessment in accordance with Article 19 of Regulation (EU) no. 10/2011.

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**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
Benzenepropanoic 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

Assuming a standard end consumer weight of 60 kg, consumption of more than 10 kg of food per day is considered certain.

**Total migration in reusable applications**

"All products" comply with the permissible total migration of 10 mg/dm<sup>2</sup> in reusable applications.

**Organoleptic properties – smell and taste**

"All products" do not cause any noticeable odour or taste deviations in food.

Test conditions (ISO 13302) in water: 2 hours, 70°C

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

As a precaution, we would like to point out that repeated use of "all products" with food may lead to deviations in odour and taste.

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### Bisphenol A or its derivatives

In "all products", both the concentration of bisphenol A or its derivatives and the migration of bisphenol A or its derivatives are below the detection limit of the respective analytical method.

### Colour fastness:

"All products" do not release any colourants into food.

Test conditions: Resolution AP(89)1, tested with water, 3% acetic acid, 50% ethanol and oil for all items.

### Substances with specific migration limits SML or SML(T)

"All products" with the exception of the "Hello Winter" to go cup and the 0.3 l / 0.4 l single wall to-go cups, slate grey, with pooling print, do not contain any substances with restrictions.

The 0.2 l double wall "Hello Winter" to-go cup and the 0.3 l / 0.4 l single wall to-go cups, slate grey, with pooling print, are printed on the outside.

The printing ink contains the following substances with specific migration limits SML or SML(T):

Suisse/EU FCM	Ref. no.	CAS no.	Substances in Printing Ink	SML mg/kg	SML (T) mg/kg	remark
95	13380 25600 94960	77-99-6	1,1,1-Trimethylolpropane	6		
861	23770	504-63-2	1,3-Propandiol	0,05		
988	-	3634-83-1	1,3-Bis(isocyanatomethyl)benzene		0,05	SML(T) applies to the migration of its hydrolysis product, 1,3-benzenedimethanamine To be used only as co-monomer in the manufacture of a middle layer coating on a poly(ethylene terephthalate) polymer film in a multilayer film

### Metals

"All products" do not contain any detectable substances subject to restrictions in Annex II of the Plastics Regulation (EU) No. 10/2011.

Metal screening with acetic acid 3% by weight.

The detection limits for the metals listed in Annex II are not exceeded.

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### Dual-use substances

The polypropylene homopolymer does not contain any dual-use substances as defined in Regulation (EC) No 1333/2008 or flavourings as defined in Regulation (EC) No 1334/2008.

### Specification for use of "all products" by the end consumer:

- ✓ All types of food.
- ✓ Any food contact conditions involving heating to a temperature of 70 °C for a maximum of 2 hours or 100 °C for a maximum of 15 minutes, not followed by long-term storage at room temperature or under refrigeration.
- ✓ Any long-term storage at room temperature or below, including packaging by hot filling and/or heating to a temperature of 70 °C for a maximum of 2 hours or 100 °C for a maximum of 15 minutes.
- ✓ Dishwasher safe.
- ✓ Suitable for deep freezing
- ✓ Microwave safe for water-based foods, maximum 15 minutes at 100°C.

### Not covered:

- ! **Microwave:** All double wall to-go cups and lids.  
**Caution: Do not microwave with fatty contents such as vegetable fat, vegetable oil, sugar or chocolate coating.**
- ! Any use of top/bottom heat, hot air, grill function in the oven or microwave, in steam cookers and similar appliances with hot air/grill function.

This declaration is provided in order to fulfil the obligation under the Plastics Regulation (EU) No. 10/2011 and does not constitute a warranty and/or guarantee of the product properties. This declaration applies to the member states of the EU, the United Kingdom, Norway, Iceland, the Principality of Liechtenstein and Switzerland.

Nette GmbH is obliged to issue a new declaration of conformity as soon as

- "all products" have undergone changes in their material properties, or
- new migration test results are available, or
- the manufacturing process has changed, or
- new regulations or scientific findings are available.



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

A declaration of conformity is a legally binding declaration by the distributor Nette GmbH. According to Article 16 of Regulation (EU) No. 10/2011, the results of migration tests are only available to the authorities responsible for us upon request.

If you have any questions, please contact Nette GmbH, [www.nette-deutschland.de](http://www.nette-deutschland.de).

Göttingen, 06.01.2026

**Nette GmbH**  
Göttingen

Signature



## Declaration of Compliance in accordance with Article 15 and annex IV of Regulation (EU) no. 10/2011

### Appendix 1

#### circ Mehrweg (Reusable) product list

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To-go cup 0.3 l single wall slate gray
To-go cup 0.4 l single wall slate gray

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To-go cup 0.3 l single wall slate gray with pooling print
To-go cup 0.4 l single wall slate gray with pooling print

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To-go cup 0.2 l double wall cream white
To-go cup 0.2 l double wall slate gray
To-go cup 0.3 l double wall cream white
To-go cup 0.3 l double wall slate gray
To-go cup 0.3 l double wall pigeon blue
To-go cup 0.3 l double wall slate gray with calibration line
To-go cup 0.4 l double wall cream white
To-go cup 0.4 l double wall slate gray
To-go cup 0.4 l double wall rosé
Lid for to-go cup, slate grey tinted

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To-Go cup 0.2 l double wall, garnet red transparent frosted with calibration line
To-go cup 0.2 l double wall, Design Hello Winter garnet red transparent with calibration line

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Soup tureen, slate gray
Rectangular plate, slate gray

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Cutlery set 3 parts with box incl. fork, knife and spoon slate gray
Knife 190 mm slate gray
Fork 184 mm slate gray
Spoon 190 mm slate gray

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Multi Cup 480 ml cream white  
Multi Cup 480 ml slate gray  
Multi Cup 480 ml garnet red  
Multi Cup 750 ml cream white  
Multi Cup 750 ml slate gray  
Multi Cup 750 ml garnet red  
Flat lid for Multi Cup 480/750 ml, highly transparent

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Food Bowl 750 ml cream white  
Food Bowl 750 ml slate gray  
Food Bowl 750 ml avocado green  
Food Bowl 1200 ml cream white  
Food Bowl 1200 ml slate gray  
Food Bowl 1200 ml avocado green  
High lid for Food Bowl 750 ml  
High lid for Food Bowl 1200 ml

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Dressing cup 100 ml with flat lid, highly transparent

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Lunch box with 1 compartment, cream white  
Lunch box with 1 compartment, slate gray  
Lunch box with 1 compartment, avocado green  
High lid, 1 compartment, highly transparent  
Lunch box with 2 compartments, cream white  
Lunch box with 2 compartments, slate gray  
Lunch box with 2 compartments, avocado green  
Lunch box with 2 compartments, garnet red  
High lid, 2 compartments, highly transparent  
Lunch box with 3 compartments, cream white  
Lunch box with 3 compartments, slate gray  
Lunch box with 3 compartments, avocado green  
High lid, 3 compartments, highly transparent

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Burger box M cream white

Burger Box M slate gray

Burger Box M garnet red

Burger Box XL cream white

Burger Box XL slate gray

Burger Box XL garnet red

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Snack tray size M slate gray

Snack tray size M garnet red

Snack tray size XL slate gray

Snack tray size XL garnet red

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Scoop cup S slate gray

Nacho tray, slate gray

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Pizza box, 2 parts, slate gray base with highly transparent lid

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Sushi box S black with lid, highly transparent

Sushi box M black with lid, highly transparent

Sushi box L black with lid, highly transparent

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Cold drink cup 0.2 l, highly transparent, frosted

Cold drink cup / Clear Cup 0.2 l highly transparent frosted

Cold drink cup / Clear Cup 0.3 l highly transparent frosted

Cold drink cup / Clear Cup 0.4 l highly transparent frosted

Cold drink cup / Clear Cup 0.5 l highly transparent frosted

Flat lid, height 7.5 mm, highly transparent

Flat lid, height 7.5 mm, highly transparent, with opening for drinking straw

Dome lid, height 35 mm, highly transparent

Dome lid, height 35 mm, highly transparent, with opening for drinking straw

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Deli cup with flat lid, 125 ml highly transparent frosted

Deli cup with flat lid, 250 ml, highly transparent, frosted

Deli cup with flat lid, 500 ml, highly transparent, frosted

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Ice cream cup 150 ml, highly transparent, frosted  
Dome lid for ice cream cup 150 ml, highly transparent  
Ice cream cup 250 ml, highly transparent, frosted  
Dome lid for ice cream cup 250 ml, highly transparent  
Ice cream cup 480 ml, highly transparent, frosted  
Dome lid for ice cream cup 480 ml, highly transparent

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Egg box, highly transparent, frosted, for 6 eggs  
Egg box, highly transparent, frosted, for 10 eggs

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Göttingen, 06.01.2026

**Nette GmbH**  
Göttingen

*ppa. U. Wille*

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