



Declaration of Compliance

for materials made from plastic intended to come into repeated contact with food

Hereby we confirm that our product:

Polypropylene Multi - Use Plastic Drinking Straws

Comply with all the European Regulations on Plastic materials & articles for plastic materials & articles intended to come into contact with food, Reg. (EU) 10/2011, European Regulations (EC) 1935/2004 & 2023/2006, including all their amendments in currently valid versions.

Comply with Requirements established by EN 12875-1 /-2 – Mechanical dishwashing resistance of utensils - 50 cycles.

When used as specified, the overall migration does not exceed the legal limits. The test was performed according to European Regulation (EU) 10/2011.

The raw materials used comply with the German Commodity Ordinance [or the respective stipulations laid down in the European Regulation (EC) 1935/2004] and European Regulation (EU) 10/2011 and all their amendments.

Comply with FDA, CFR Part 21 § 177.1520 Part (c) 1.1a. - Olefin polymers as well as § 178.3297 - Colorants for polymers.

Comply with BfR recommendation IX. Colorants for Plastics and other Polymers Used in Commodities (2015).

Comply with Resolution AP (89)1 on the use of colorants in plastic materials coming into contact with food as well as CONEG Regulation.

Comply with directive 2011/65/EU, as well as the Swiss Ordinance on VOC (volatile organic compounds).

Comply with Regulation No. 178/2002/EC laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety as well as Directive 2001/95/EC on general product safety.

Fulfill the requirements set in Directive 2011/65/EC (RoHS).

BADGE, BFDGE, NOGE

Bisphenol A and its derivatives e.g. Bisphenol A diglycidyl ether (BADGE)

Bisphenol F and its derivatives e.g. Bisphenol F diglycidyl ether (BFDGE)

Bisphenol S and its derivatives and NOGE, Bisphenol M are not used in the manufacture or the formulation of this product according to requirements of European Regulation 1895/2005/EC, on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food.



Active and intelligent materials

Our products are manufactured without the use of active and intelligent materials (Regulation EC No 450/2009).

Endocrine disruptors

Our product does not contain any endocrine disruptors within the meaning of EU delegated regulation 2017/2100.

Packaging waste, TPCH

The heavy metals cadmium, lead, mercury and chromium VI are not intentionally used in the manufacture of our straws. The sum of heavy metals cadmium, lead, mercury and chromium VI incidentally present is way below 100ppm. Therefore, our straws comply with the Directive 94/62/EC as amended, as well as the limit of US Model Toxics in Packaging Legislation by Toxics in Packaging Clearinghouse (TPCH), established by the Coalition of Northeastern Governors (CONEG).

CALIFORNIA PROPOSITION 65

We hereby confirm that our products do not contain any chemicals known to the State of California to cause cancer, birth defects or other forms of reproductive harm.

GMO

We hereby confirm that Genetically Modified Organisms (GMO) are not intentionally added in the production of our product.

Allergens

Straws are manufactured without the intentional use of substances currently known to be or suspected of being food allergens. Furthermore, they are manufactured without the use of ingredients listed in Annex III LMKV.

Substances currently known as or suspected to be food allergens (listed in Annex II of Reg. (EU) No 1169/2011) are not being part of the raw materials used in their production, not used or intentionally added in their production process, not present in our factory and therefore, contamination from the processing equipment is also excluded.

Gluten

We confirm that our products are gluten free.

The raw materials used in their production are gluten free, are not obtained from mixtures of cereals containing gluten (ex wheat) and that, therefore no gluten is contained in any of our finished products.

No gluten containing materials are being handled at our facilities and therefore no potential for contamination of finished products exists.

BSE infection

Our products are manufactured without any derivatives of animal origin. There is no scientific reason to assume any risk of BSE transfer through them.



Dual use additive E 470a may be contained in the product.

There is NO other substance subject to limitations and/or specifications/ SMLs (specific migration limits) used in the above-mentioned product.

No post-consumer recycled materials are included.

It is NOT used a functional barrier made from plastic.

REACH REGULATION (EC) 1907/2006

To our knowledge and based on the information from our suppliers we can confirm that our products do not contain:

- Substances included on the Candidate List of SVHCs (incl. Annex XIV, Authorization) in a concentration above 0.1%
- Substances included in Annex XVII

Furthermore, we confirm that our straws are manufactured without the intentional use of the following substances:

- Arsenic and arsenic compounds
- Asbestos
- Azo dyes
- Barium
- Boron and boron compounds
- Benzene
- Benzophenone and 4-methylbenzophenone and their derivatives
- Beryllium
- Brominated fire retardants
- Cadmium
- Chain-and ring-shaped hydrocarbons (MOSH, "mineral oil saturated hydrocarbons"), Mineral Oil Aromatic Hydrocarbons (MOAH)
- Chlorinated paraffins
- CFC (chlorofluorocarbons) y HCFC (hydrochlorofluorocarbons)
- Cobalt, Cobalt(II)-chloride (CAS 7646-79-9 (anhydrous))
- Cyanuric acid (1,3,5-triazin-2,4,6-triol)
- Diethylhexyl adipate (DEHA)
- Dimethylfumarate (DMF)
- Diphenyl-2-ethylhexylphosphate (DPO)
- Ethyl-4-dimethylaminobenzoate
- Elastomers or rubber from which n-nitrosamines may be released
- Epichlorohydrin
- Epoxidized soybean oil (ESBO)
- 2-ethylanthraquinone
- Ethyl-4-(diethylamino)benzoate (EDAB)
- 2-ethylhexyl-4- (dimethylamino)benzoate (EHDAB)
- Europium

- Formaldehyde
- Formamide
- Gadolinium
- Halogens, halogenated compounds
- 1- hydroxycycloheptylketone
- Isopropylthioxanthone (ITX)
- Lanthanum
- Latex
- Lead and lead compounds
- Lindane
- Lithium
- Magnesium
- Maleicacid-di-(2-thylhexyl)-ester
- Melamine
- Manganese
- Mercury
- Novolac glycidyl ether (NOGE)
- Nanoparticles and-materials (< 100 nm)
- N-Ethyl o-Toluensulfonamide and N-Ethyl p-Toluensulfonamide (NETSA)
- Nickel
- Nitrofural / Nitrofurazone
- Nitrosamines
- Nonylphenol, nonylphenol ethoxylate and cement
- Organic brominated compounds (pentabromodiphenyl ether, octabromodiphenyl ether...)
- Palm oil
- Parabens
- Pentachlorophenol and its salts and esters
- Perfluoroalkyl and polyfluoroalkyl substances
- Fluorosurfactants, PFAS, PFOA / PFOS / Perfluorinated organic compounds & fluorinated surfactants, substances
- PBT Substances (Persistent, Bioaccumulating and Toxics) and vPvB (very persistent and very bioaccumulating)
- Phenols & Phenylphenole
- Phosphates, triaryl phosphates
- Phthalates
- Polycyclic aromatic hydrocarbons (PAHs)
- Potassium
- Polybrominated diphenyl ethers (PBDE)
- POSH & PAO
- Primary aromatic amines
- Semicarbazide (SEM)
- Solvents: dichloromethane, dimethylacetamide, dimethylformamide, 2-ethoxy ethanol, nitrobenzene, trichloroethylene trichlorobenzene, trichloromethane, hexachlorobenzene
- Sodium
- Styrene and Polystyrene

- Terbium
- Thiuram
- Titan-acetylacetonate (TAA)
- Toluene
- Tributyltin (TBT)
- Tributyltin oxide (TBTO)
- Tris(4-nonyl-phenyl) phosphite (TNPP)
- Triclosan
- Vinyl chloride monomer (VCM) and its polymers (PVC...)
- Zinc

None of the above-mentioned substances / compounds are being a part of the formulation of our products or their packaging and the raw materials used in their manufacture do not contain any substance than can degrade into or be capable of releasing the above-mentioned restricted substances / compounds.

TEST 1: MIGRATION ANALYSIS	
PRODUCT: Polypropylene multi - use straws	CONDITIONS - RESULTS
MATERIAL: 100% Polypropylene (Cas. No.: 9003-07-0) with colorants	<p>Overall Migration into 3% acetic acid (2h/70° C by total immersion): <10 mg/dm² (limit 10 mg/dm²)</p> <p>Overall Migration into 50% Ethanol (2h/70° C by total immersion): <10 mg/dm² (limit 10 mg/dm²)</p> <p>Estimation of the Specific migrations: specific migration is not considerable</p>
STANDARD: EN 1186-3:2002	CONCLUSION
<p>Compliance of the material verified on the basis of the level of the third migration.</p> <p><i>(The migration in the second test does not exceed the level observed in the first test, and the migration in the third test does not exceed the level observed in the second test).</i></p>	<p>PASS</p> <p><i>Sample is within limits according to (EU) Regulation 10/2011 (as amended 23.09.2020) for plastic materials that will come in repeated contact with all aqueous, acidic and alcoholic foods and milk products.</i></p>

TEST 2: MECHANICAL DISHWASHING RESISTANCE OF UTENSIL	
PRODUCT: Polypropylene multi - use straws	CONCLUSION PASS <i>Comply with Requirements established by EN 12875-1 /-2 – Mechanical dishwashing resistance of utensils. - 50 cycles</i>
MATERIAL: 100% Polypropylene (Cas. No.: 9003-07-0) with colorants	
STANDARD: EN 12875 Parameter: Dishwashing Resistance (Maximum temperature: 65°C)	

Specification of the intended use or limitations:

- Type(s) of food intended to come into contact with the material:
All Aqueous, Acidic and alcoholic foods and milk products
- Duration and temperature of treatment and storage while in contact with the food: 2 hours, 70°C tested
The product is suitable to come into **repeated contact** with the above-mentioned types of food at any food contact conditions that include hot-fill and/or heating up to a temperature T where $70\text{ °C} \leq T \leq 100\text{ °C}$ for maximum of $t = 120/2^{((T-70)/10)}$ minutes, which are not followed by long term room temperature or refrigerated storage.
- Ratio of the area of food contact material to the volume used to determine the compliance of the plastic food contact material or article:
1.1 – 1.9 dm² / 100ml simulant
- Under FDA: The product may be used in contact with the food types I., II., IV-B., VI-A, VI-B and VI-C as described in table 1 of CFR 21 §176.170(c), under conditions of use D through G as described in table 2 of CFR 21 §176.170(c).

Traceability of the product is ensured according to European Regulation (EC) 1935/2004 via the number of the production lot and the date of production displayed on the production carton.

Athens, 25/10/2023

Place/date



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Signature

Expires 3 years after date of issue