

DECLARATION OF COMPLIANCE FOR MATERIALS AND ARTICLES
INTENDED TO COME INTO CONTACT WITH FOOD
PAPER CUTLERY
(Revision 1.1: 13/05/2026)

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Hereby declare that the products mentioned below:

PAP3510	PAPER Fork FSC MIX Credit 17cm 20x50p
PAP3510G5	Fork PAPER 17cm 20x50p Gen5
PAP3511	Knife PAPER FSC MIX Credit 17cm 20x50p
PAP3512	PAPER Spoon FSC MIX Credit 17cm 20x50p
PAP3513	PAP Coffee Spo FSC MIX Credit13cm 20x50p
PAP3532	Cutlery Kit (F,K)PAP FSC MIX Credit 6x50k
PAP3533	Cutl Kit (F,K,N)PAP FSC MIX Credit 6x50k
PAP3534	Cut Kit (F,K,S,N)PAP FSC MIX Credit 6x50k

Which consists of cutlery made of virgin natural paper fiber material dipped for its usual part in a polymeric (acrylic) water based emulsion.

Comply with the following regulations:

- **1935/2004** : Regulation (EC) of the European parliament and of the council of 27 October 2004 on materials and articles intended to come into contact with food.

In the following condition of use:

Contact with all type of food.

Temperature of use : -10°C to max 100°C

Paper board complies with

- German BfR recommendation XXXVI/2
- Fiche DGCCRF on “organic materials based on vegetal fibers intended to come into contact with food”

Additives complies with 10/2011/EU and amendments

The products we supply comply with the overall migration limit of 60 mg/Kg or 10mg/dm² as laid down in regulation 10/2011/EU.

Test condition: 2 hours at 70°C (simulant A and B), 2 hours at 60°C

Simulants : A Ethanol 10%, B Acetic Acid 3%, and Ethanol 95% (substitut D2)

Following substances submitted to Specific Migration Limit (SML) might have been used:

FCM number	N° CAS	Substances	Specific migration limit (SML) or other restriction
147	79-10-7	Acrylic acid	6 mg/Kg food

- **2023/2006/CE** : commission regulation from 22/12/2006 on good manufacturing practice for material and articles intended to come into contact with food.
- **Phthalates** are not used in the manufacturing process.
- **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.
Recycled FCMs are not within the scope of Regulation (EU) 2024/3190.” (See EC Guidelines Response to Q2).
- **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 with regard to:
 - Heavy metal content <100 ppm
 - Absence of identified hazardous substances
 - Absence of PFAS
 - Recyclable
 This declaration is supported by comprehensive technical documentation prepared in response to Article 39 and Annex VIII of the PPWR.

Shelf life: 2 years under ideal storage condition: dry, ambient temperature (8°C up to 25°C), in original packaging.

According to the European legislation in force, this is the responsibility of the end user to verify the technical suitability of the product for his specific intended use.

This letter replaces all previous versions.

Valid two years.

This declaration is done for **Aktum A/S**

Nivelles, 29/05/2026



Isabelle Ernotte
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