



DECLARATION ON ALLERGEN CONTROL POLICY (USA)

1. Producer and signatory identity

M. Michelangelo Anderlini

Role : Technical Director

Producer : BIOPAP Srl Società Benefit, Via Edison 237 – 20019 Settimo Milanese (MI) Italy

2. Material identification

Description Compostable Food Containers and Trays

Reference: BIOPAP® LC

Declaration Date: 17/09/25

3. Allergens Control Policy

We hereby confirm that, with reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Regulation (EU) No 1169/2011 Annex II as amended, the following food allergens or products derived thereof are not intentionally added neither in the recipes of our BIOPAP® LC material nor during the manufacturing of Food Containers and Trays.

- Crustaceans and products thereof (Including Crustacean shellfish; FALCPA) - Eggs and products thereof - Fish and products thereof* - Peanuts and products thereof - Soybeans and products thereof* - Milk and products thereof* - Nuts and products thereof* (Including Tree nuts; FALCPA) - Celery and products thereof - Mustard and products thereof - Sesame seeds and products thereof - Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂. - Lupin and products thereof - Molluscs and products thereof

*Notice the exceptions in Commission Directive 1169/2011/EC, Annex II

Allergens declarations are provided in the Declaration of Compliance from our supplier.

The risk assessment on allergens indicates the only potential source of allergenic substances can come from the working personnel or visitors accessing the manufacturing environment.

We hereby declare GMP are applied in our production facility according to CE Directive 2023/2006 and we comply with the US GMP requirements 21 CFR 110. This relates to procedures and training to be observed by the workers accessing the manufacturing halls with specific regard to dressing, cleanliness, hygiene. This also applies to visitors.

GMP Training including Allergens is made with every new employee having access to the production facility and refresh is done yearly.



GMP Manual Section 4 includes:

- 4.1 Personnel hygienic infrastructures
- 4.2 Standards and behaviour for personnel and visitors accessing production facilities
- 4.3 Food and Drink policies
- 4.4 Jewels and trinkets
- 4.5 Smoking policy
- 4.6 Personnel's clothing and protection
- 4.6 Training
- 4.7 Personnel health checks



Dr. Eng. Michelangelo Anderlini
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