DECLARATION OF COMPLIANCE FOR FOOD CONTACT MATERIALS

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 lids type MT, CT and SL for BIOPAP® Trays

Reference: BIOPAP® LP

Material Structure:

The material is made out of pure bleached pulp board (ECF) with a barrier coating enhancing moisture and grease resistance on the food contact side.
The barrier is made out of a water-based emulsion that is crystallized and dried on the pulp board surface by infrared rays.

Declaration Date : 13/05/2026

3. Material Conformity

BIOPAP® MT and CT food lids are suitable for direct food contact with dry, watery, acid, low alcoholic, dairy and fatty food in a temperature range from -90°C to +215°C according to:

*Italian DM 21-03-1973 and subsequent updates
*Reg. CE 1935/2004
*Reg. UE 10/2011 and subsequent updates
* Italian DPR 777/82 and subsequent updates
*Directive CE 2023/2006 (GMP) and following the guidelines of the BRC IOP (packaging) and USA GMP requirement (21 CFR 110)
*FDA Regulations, 21 CF Regulations part 176.170 and 176-180 Paper and paperboards
*Reg. UE 2025/40 PPWR

This declaration of conformity has been established based on the raw materials suppliers' declaration, the Overall Migration Limits are met under the following conditions and as test report 0418\FPM\FDC\25 Dated 06-03-25 - 2054\FPM\FDC\24 Dated 11-11-2024

Simulant	Test conditions	Measured Value	Limit Value
B	2 hours at 100°C	3.5	10
C Ethanol 20%	2 hours at 100°C	3.5	10
E	2 hours at 200°C	1.9	10

-BIOPAP® lids can be used in the freezer, refrigerator, microwave and traditional oven.

- BIOPAP® lids must comply with the following notices: do not place the container in the oven without food. Avoid contact or proximity to open flames, hot walls and electrical resistances. Cook at a temperature not exceeding +215 ° C. Do not leave in the oven at maximum temperature for more than 40 minutes. In the microwave oven, maximum 10 minutes at 800W.

Additional Evaluation on paper microcontaminants

Report 0587\FPM\FDC\24 dated 02-05-2024

Analysis	Method	Max. Limit	Result
Antimicrobial Agent transfer	EN 1104	No transfer	No transfer
OBA transfer	EN 648 A,B,C,D	5 /5	No transfer
		WCC	Result
Fluorinated compounds (PFAS)	Solvent extraction + LC-MS/TOF	<0.001 mg/kg of food	<0.0001 mg/dm2 <LoQ

4. Information on Substances subject to specific restrictions

- Specific Migrations :
  The following substances or residuals with specific migration limits (SML) may be found according to (EU) No 10/2011 or otherwise stated based on the information received from our raw material suppliers.

Substance	CAS No.	SML/Limitation mg/kg
Ammonia	7664-41-7	OML 60
1,2-benzisothiazolin-3-one	2634-33-5	SML=0,5[1)]
Monomer 1		SML(T)= 6 as methacrylic acid
Monomer 2		SML= 0,05
Monomer 3		SML= 0,05
Monomer 4	100-42-5	OML 60
Monomer 5		SML(T)= 6 as methacrylic acid
Monomer 6		SML(T)= 6 as acrylic acid
Polymer 1		SML= 1,8
2-propanol	67-63-0	OML 60
Talc	14807-96	OML 60
Tert-butyl hydroperoxide	75-91-2	SML: ND[2)]
Hydrogen Peroxide	7722-84-1	SML: ND[2)]

1) Added as a process biocide, considered as Polymer Production Aid. Restriction of the ResAP (2004)1.

2) Added as Polymerization Aid. BfR XIV. Polymer Dispersions.

- Bisphenols:
  Conformity established through HPLC-MS after extraction, according to test report 0587\FPM\FDC\24 dated 02/05/24

Substance	Limit mg/kg	Results mg/kg
Bisphenol A	<0.05	<0.0003
Bisphenol S	<0.05	<0.0003

- Heavy Metals:
  Conformity established through ICP analysis with acid extraction, test report 0587\FPM\FDC\24 dated 02/05/24

Substance	Limit mg/kg	Result mg/kg
Al	<1	<0.2
Ba	<1	<0.03
Co	<0.05	<0.06
Cu	<5	<0.05
Fe	<48	<0.09
Li	<0.6	<0.006
Mn	<0.03	<0.05
Ni	<0.003	<0.01
Zn	<0,2	<0.05

- Phtalates:
  Conformity established through GC MS after solvent extraction, test report 0587\FPM\FDC\24 dated 02/05/24

Substance	Limit mg/kg	Result mg/kg
Dibutyl Phthalate	<0.0002	0,3
Diisobutyl phthalate	<0.0002	Not listed
Bis(2-ethylhexyl) phthalate	<0.0002	1.5
Benzyl Butyl Phthalate	<0.00023	30
Diisononyl phthalate	<0,021	9
Diisodecyl phthalate	<0,021	9

- MOAH MOAH:
  No substances in the MOAH fractions are detectable. SQTS Test report n.2026L03741/1 dated 19/02/2026.

- GMOs :
  According to the current information received from our suppliers, GMOs (according to the definition of EU Directive 2001/18 / EC) are not used as manufacturing components or are not intentionally added in manufacturing recipes.

- Paper manufacturing additives :
  According to the current information received from our suppliers, the following components are not used as manufacturing components or are not intentionally added in the manufacturing recipes.
  - Talc (CAS 14807-96-6)
  - Calcium Carbonate (CA 471-34 1)
  - Titanium Dioxyde (CAS 13463-67-7)

- Dual Use Substances
  According to the information received from our raw material suppliers, the below substances authorized as a food additive according to Reg. (EC) 1333/2008 may be present in the composition but not in relevant quantities.

Substance	Identification : n° E or FL
Sodium Sulphate	E514
Sodium Sulphite	E221
Polydimethyl siloxane	E900

5. Information relevant for the final use of the material

The lids covered by this declaration are suitable for direct food contact with dry, aqueous, acidic, low alcoholic, dairy and fatty foods.

Standard food contact conditions:
-Suitable for food Deep Freezing
-Suitable for food Chilling
-Suitable for heating or cooking food up to 40' at 215 ° C or in microwave Oven up to 10 minutes at 800W

Maximum contact surface ratio to establish the compliance for this declaration: 1kg of food per 6 dm^2

6. Percentage of non-fossil based components

Percentage of non-fossil based components in BIOPAP® compostable MT and CT lids > 97%

7. Other Information

- Forest Certification/Origin. Compliance Reg. EC no. 2023/1115
  100% of the BIOPAP® packaging solutions produced are PEFC® certified. Raw materials of forestry origin only come from certified, well-managed forests and 100% of the forestry materials purchased are PEFC® certified. BIOPAP® undergoes an annual audit.

- Printing :
  BIOPAP® food lids are printed on the outside with inks and lacquer compliant with food packaging applications and compliant with EuPIA April 2020 good practices.

- Nano components
  Based on the current information received from our suppliers, no substances in nanoscale form are used as a component or intentionally added to production recipes.

- REACH
  According to current information received from our suppliers, only chemical components compliant with REACH regulation (EC) No. 1907/2006 are used in the production recipes. In particular, the substances of Annex XIV and Annex XVII of this Regulation are not present in the manufacturing recipes.

This declaration is valid only for the material or object as delivered lids and as long as there is no regulatory modification or change likely to result in a modification of the inertia of the material or of the item.

In any case, compliance is undertaken only with proper conditions of storage, handling and use, taking into account the particular characteristics of the material or object and as set for by usage or professional codes.

In the event of a change in the characteristics of the packed product, its composition or its destination, as well as in the event of a change in the conditions of use of the material or article, the person to whom this declaration is made must ensure the compatibility Food/Lids for which he assumes the sole responsibility

Michelangelo Anderlini
(Technical Director)

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