



**Kreis Pack Sp. z o.o.**

Ul. Leśna 22, PL 64-320 Niepruszewo

NIP: 781-00-23-410; REGON: 632189672

KRS: 0000113495; District Court in Poznań – Nowe Miasto and Wilda in  
Poznań 9th Commercial Division of the National Court Register

Share and paid-up capital : 1'048'200zł

Phone no: 61 8940570, 61 8940580, Fax: 61 8940590

office@kreispack.pl; www.kreispack.pl

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## DECLARATION OF CONFORMITY

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|---|--|---|
| 1 | Name and address of the commercial body that issues declaration of conformity:   | Kreis Pack Spółka z o. o.<br>ul. Leśna 22<br>64-320 Niepruszewo<br>Poland   |
| 2 | Name and address of the commercial body producing or transporting products of sugar cane pulp or products of intermediate manufacturing stages, and substances intended for manufacturing of these materials and products; | Kreis Pack Spółka z o. o.<br>ul. Leśna 22<br>64-320 Niepruszewo<br>Poland   |
| 3 | Data identifying materials, products and products of intermediate manufacturing stages and substances intended for manufacturing of these materials and products;  | Products belonging to the group of eco-friendly disposable dishes made from sugar cane pulp: white plates and bowls; round, oval and square.  |
| 4 | Declaration date:  | 07.04.2017r.  |
| 5 | Confirmation that materials or products from sugar cane pulp meet the requirements of EC Regulation no 1935/2004 and those mentioned herein.   | We hereby confirm that the products listed in point 3 meet relevant requirements defined in: <ul style="list-style-type: none"><li>• Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food, repealing directive 80/590/EEC and 89/109/EEC,</li><li>• Resolution (EC) no 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food, with amendments,</li><li>• Directive of European Parliament and Council 94/62/EC of 20 December 1994, amended with directives 2004/12/EC, 2005/20/EC as amended,</li><li>• Food and nutrition safety act of 25 August 2006 as amended,</li><li>• Act dated 13 June 2013 on packaging and packaging waste management,</li><li>• Resolution of the Minister of Health of the Czech Republic no 38/2001 as amended, and selected requirements of "Industry guidelines relating to materials and products of paper and cardboard intended to come into contact with food" (Edition of 2 September 2012, drafted by representatives of the European industry of paper and cardboard packaging).</li></ul> |

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- 6 Relevant information on use of substances or their disintegration products for which limits and requirements have been defined, in order to make it possible for market participants to meet conformity requirements at further trade stages;
- Sugar cane pulp is a natural substance of plant origin and a quickly renewable source used for manufacturing of disposable dishes.
- Because of lack of legal regulations relating directly to products of sugar cane pulp, verification in relation to requirements for paper and cardboard products has been used as an auxiliary as both raw materials are of plant origin.
- Products mentioned in point 3 were subject to verification based on the requirements of the Resolution of the Minister of Health of the Czech Republic no 38/2001 as amended, and based on selected requirements of "Industry guidelines relating to materials and products of paper and cardboard intended to come into contact with food". Migration levels conform with the above-mentioned acts, in particular specific migration limits for our products are correct.
- 7 Relevant information on substances subject to limitations in food, derived from experimental data or from theoretical calculations, in order to make it possible for the user of these materials and products to achieve conformity with relevant EU regulations and, if these are lacking, with domestic regulations applicable for food;
- Such a declaration is based on results of tests performed by independent, accredited and certified laboratory.
- Test of heavy metal content performed by Hygiene Laboratory Centre in Ostrawa between 24.11.2014r. and 08.12.2014r. according to Directive of European Parliament and Council 94/62/EC show full conformity with EU requirements on total heavy metal content; the limit being 100 ppm (mg/kg).
- Tests showed the following content of heavy metals:
- |               |                                    |
|---------------|------------------------------------|
| Lead (Pb):    | <,0150 mg/kg of dry solid content  |
| Cadmium (Cd): | <0.0190 mg/kg of dry solid content |
| Chromium (Cr) | <0.0190 mg/kg of dry solid content |
| Mercury (Hg): | <0.010 mg/kg of dry solid content  |
| Arsenic (As): | <0.0150 mg/kg of dry solid content |
| <hr/>         | <hr/>                              |
| Total:        | <0.0609 mg/kg of dry solid content |
- Total: <0.0609 mg/kg of dry solid content
- Total heavy metal content in the tested articles does not exceed 0.0609 mg/kg of dry solid content
- Tests of specific migration of metals and primary aromatic amines performed by Hygiene Laboratory Centre in Ostrawa between 24.11.2014 and 8.12.2014 show that our products fully conform with migration limits defined in Appendix no 12 of the Regulation of the Minister of Health of the Czech Republic no 38/2001 (with amendments), not even approaching the legal limits. Additionally, the results conform with selected limits according to "Industry guidelines concerning conformity of paper and cardboard materials and products intended for contact with food".

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Specific migration tests results for the substances listed below in products subjects to tests:

Substance	Food simulant	Testing conditions	Result		Limit
Formaldehyde	Water distille	24 hours temp. +20 ±2°C	< 0,0035 mg/dm <sup>2</sup>	Aldehydes:	1 mg formaldehyde/ dm <sup>2</sup> for ready- made products in relation to dry solid content
Phenols	Distilled water	24 h temp.+20±2°C	< 0,0010 mg/dm <sup>2</sup>	Phenolic compounds	0.05 mg of phenol/dm <sup>2</sup> for ready-made products in relation to dry weight
Phtalates *		24 h temp.+20±2°C	< 0,003 mg/dm <sup>2</sup>	Diacryl ester of phtalic acid:	0.2 mg/dm <sup>2</sup> for ready-made products in relation to dry solid content
Total nitrogen	Distilled water	24 h temp.+20±2°C	< 0,025 mg/dm <sup>2</sup>	Total nitrogen:	0.2 mg nitrogen/dm <sup>2</sup> for ready-made products in relation to dry solid content

\* The tested total for phtalates is lower than the total of all tested phtalates listed in "Industry guidelines" and it is also lower then limit value for each of the phtalates listed in "Industry guidelines" separately.

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Specific migration limit for primary aromatic amines acc. to "Industry guidelines concerning conformity of paper and cardboard materials and products intended for contact with food" is 0.1 mg/kg.

Test results for specific migration for primary aromatic amines in our products:

Food simulant	Testing conditions	Result	Limit
Distilled water	24 h temp. +20±2°C	<0.004 mg/kg	<0.1 mg/kg

- 8 Requirements relating to use of material or product such as:
- (i) type(s) of food with which the material or product comes in contact;
- (ii) time and temperature for processing and storage in contact with food;
- (iii) ratio of contact surface to volume used to assess conformity of the material or product;
- The above-mentioned test results allow us to declare what follows:
- (i) Our products can be used for fat and dry food. For shorter periods of time they can be used for hydrated food.
- (ii) taking into account excellent specific migration test results, and special testing conditions (24 hours at +20±2°C), duration of contact into food is appropriate for food intended for immediate consumption. Usable range of temperatures for the products is included within the range of -20°C to +70°C for a short period of time (ca. 15 minutes). In particular the upper temperature limit should not be exceeded.
- Once the above-mentioned temperature limitations are observed, the products can be marketed and used under normal and foreseeable conditions:
- do not constitute a hazard to human health,
  - do not cause unacceptable changes in food composition,
  - do not cause deterioration of organoleptic properties of food.
- Products belonging to the group of eco-friendly disposable dishes **CAN** be used to heat food in microwave ovens for a short period of time (about 2 minutes).
- These products, made of raw materials of plant origin, are biodegradable.
- (iii) ratio of contact surface to volume used to assess conformity of the material or product differs for various products and if possible it can be calculated upon request for specific products. For products subjected to laboratory tests this value is about 0.02.
- 11 Additional information on the company
- Both manufacturer and importer: Kreis Pack Spółka z o.o. uses ISO 9001:2008 quality management system and it uses HACCP rules.
- This can be certified by a certification body TÜV SÜD Management Service GmbH that issued certificate with registration number: 12 112 313877 TMS.



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- 12 Declaration validity: The present declaration applies to each product batch imported by Kreis Pack.  
Similarly as in Regulation of the Commission (EC) no 10/2011 "Declaration shall be renewed if there are significant changes in ingredients or manufacturing process that entail a change in migration levels from materials or products or if new scientific data are available".  
Kreis Pack Spółka z o.o. shall be obliged to immediately issue a new version of the present declaration if such a situation occurs.
- 13 Document Title: Cert\_KP\_PULP\_KPLP\_ENG
- 14 Document version: 04
- 15 Person responsible for making this declaration: Kinga Kaczmarek  
Department: Quality assurance department  
kontrola-jakosci@kreispack.pl  
Contact data:
- 16 Declaration expiry date: A document made in a electronic format (PDF), processed and sent in an electronic format is valid without company stamp and signature.