Declaration of Compliance

July 1, 2026

Product description: Single-wall paper cups manufactured from PE-coated paperboard

Product code: SW4, SW6, SW6.5, SW7, SW8, SW9, SW10, SW12, SW16, SW20, DW8, DW12, DW16, DW20

Grammage: 195–285 g/m²

Coating layer: The PE coating is applied either to both sides of the product or to the food contact side only, depending on the product specification.

Coating weights vary depending on specifications, this DoC covers all layer grammages mentioned in the specification.

For further information, please refer to the applicable Technical Data Sheet and Product Specification.

Producer: UAB “Ronelda”, Uosių g. 126, Pagojo km., Kelmės raj., LT-86152, Lithuania

Compliance with European food contact and packaging legislation

The products described herein comply with the applicable legal requirements for materials and articles intended to come into direct contact with food and with applicable EU packaging requirements, including:

- Regulation (EC) No 1935/2004 of the European Parliament and of the Council on materials and articles intended to come into contact with food;
- Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food;
- Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste (PPWR), insofar as applicable;
- Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment (Single-Use Plastics Directive), insofar as applicable to paper beverage cups containing a plastic coating, including the applicable marking requirements laid down in Commission Implementing Regulation (EU) 2020/2151;

UAB „RONELDA“Uosių g.126, Pagojo k.,
LT-86152 Kelmės r.

+37065751441
hello@cupernican.com

Įm.k. 304092351
PVM k. LT100010000512
Artea bankas, AB
LT027180200025467201
SWIFT code: CBSBLT26XXX

- EN 13427:2004 — Packaging — Requirements for the use of European Standards in the field of packaging and packaging waste;
- EN 13428:2000 — Packaging — Requirements specific to manufacturing and composition — Prevention by source reduction
- EN 13429:2004 — Packaging — Reuse
- EN 13430:2004 — Packaging — Requirements for packaging recoverable by material recycling;
- Commission Regulation (EU) No 10/2011, as amended, on plastic materials and articles intended to come into contact with food, insofar as applicable to the plastic layer of the multi-material multi-layer article.

Additional national legal requirements

- HN 16:2011 — Hygiene norm of the Minister of Health of the Republic of Lithuania concerning materials and articles intended to come into contact with food (Materials and articles intended to come into contact with food — Special health safety requirements).

Suitability for use

This product is approved for direct food contact with dry, aqueous, acidic, alcoholic and fatty foodstuffs.

This product is intended for use under the following conditions:

- Any long-term storage at room temperature or below (including freezer/fridge)
- Hot fill (temperature not exceeding 80 °C at the moment of filling, after which the food cools down to 50 °C or below within 60 minutes, or to 30 °C or below within 150 minutes)

This product is NOT intended for use under the following conditions:

- Microwave oven
- Conventional oven

Storage recommendations

The product properties are guaranteed for 12 months after the production date. In order to ensure product safety, products must be well packed and stored indoors, sheltered from rain and snow. The recommended storage conditions are 50-55% relative humidity and 20-23° C.

For the product treatment, we recommend using the product within 12 months of the production date; after this period, the product should be tested before using.

Compliance with PPWR Requirements

Based on supplier declarations, available analytical reports and internal risk assessment, we confirm that the product complies with the applicable requirements of Article 5 of Regulation (EU) 2025/40, including Article 5(4) concerning heavy metals and, from 12 August 2026, Article 5(5) concerning PFAS restrictions applicable to food-contact packaging.

Recycled plastic

No recycled plastic is used in the PE food-contact layer of the products covered by this Declaration. Therefore, Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods is not applicable to these products.

Overall migration tests according to Commission Regulation (EU) 10/2011

Overall migration testing has been performed on representative samples of the finished product in accordance with EN 1186. The measured overall migration values were below 10 mg/dm² under the tested conditions.

Analyte	Method index	Result	± U	Unit of measure
Formaldehyde content (into 3% acetic acid)	LST CEN/TS 13130-23:2006, except p.6.1.2.1, 6.1.3, 6.3.2, 9.4.1.1	<1,0	-	mg/kg
Overall migration into 3 % acetic acid	LST EN 1186-3:2022, except p. 4.1.3; 4.1.4; 4.4.2.2; 4.4.2.3; 4.5.3; 4.5.4.	1,3/1,1/0,9 average: 1,1	0,3	mg/dm²
Overall migration into 50% ethanol	LST EN 1186-3:2022, except p. 4.1.3; 4.1.4; 4.4.2.2; 4.4.2.3; 4.5.3; 4.5.4.	a<0,5/a<0,5/ a<0,5 average: a<0,5	-	mg/dm²

Heavy Metals and PCB Test Results

Substance	Method index	Result
Cadmium content	LST EN 12498:2019	< 0,005 mg/kg
Lead content	LST EN 12498:2019	< 0,05 mg/kg
Chromium content	LST EN 12498:2019 (N)	< 0,025 mg/kg
Mercury content	LST EN 12497:2005 (N)	< 0,025 mg/kg
Polychlorinated biphenyls		
2,2',5 - trichlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg
2,4,4' - trichlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg
2,2',5,5' - tetrachlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg
2,2',4,5,5' - pentachlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg
2,2',3,4,4',5' - hexachlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg

2,2’,3,4,4’,5,5’ - heptachlorobiphenyl content	LST EN ISO 151318:2001 (N)	< 0,05 mg/kg

Bisphenol A and other hazardous bisphenol substances

According to our suppliers, bisphenol A (BPA), other hazardous bisphenols and their derivatives are not intentionally added, and the plastic layer is therefore considered to comply with Regulation (EU) 2024/3190, as corrected by Regulation (EU) 2026/250.

PFAS Compliance

Based on supplier declarations, available analytical reports and internal risk assessment, we confirm that the product:

- contains no intentionally added PFAS substances (polymeric or non-polymeric);
- complies with PPWR, in particular Article 5, including Article 5(1), Article 5(4) (100 mg/kg heavy metals limit) and Article 5(5) (PFAS limits) and also complies with the legal limits specified in Article 5(5) of the PPWR, namely:
    - < 25 ppb – individual non-polymeric PFAS,
    - < 250 ppb – total non-polymeric PFAS,
    - < 50 ppm – total fluorine (TF),
- Where analytical testing has been carried out, Total Fluorine (TF) analysis has been used as part of the assessment of compliance with the applicable PPWR requirements.

REACH Regulation (EC) 1907/2006

To the best of our knowledge and based on the information provided by our suppliers, this product complies with the requirements of Regulation (EC) No. 1907/2006 (REACH), including the restrictions set out in Annex XVII and the SVHC communication requirements under Article 33.
No substances restricted or prohibited under REACH are intentionally added during the manufacture of this product.

Printing inks and coating compliance

The printing inks used for the products covered by this Declaration are water-based inks applied to the non-food-contact side of the cup. Based on supplier Declarations of Compliance and supporting technical documentation, the printing inks comply with the applicable requirements for their intended use, including Regulation (EC) No 1935/2004, Commission Regulation (EC) No 2023/2006 and Regulation (EC) No 1907/2006 (REACH).

The PE coating forming the food-contact layer is manufactured from materials complying with the applicable compositional requirements of Commission Regulation (EU) No 10/2011.

MOSH/MOAH (mineral oil)

MOSH/POSH and MOAH specific migration testing was performed using 3% acetic acid (Food Simulant B) and 50% ethanol (Food Simulant D1) under conditions of 2 hours at 70°C. No MOSH/POSH or MOAH fractions (C10–C50) were detected. The testing was performed by an accredited laboratory.

Supporting documentation

Compliance with this Declaration is supported by:

1. Supplier Declarations of Compliance and Food Contact Declarations;
2. Raw material specifications and Technical Data Sheets (TDS);
3. Printing ink compliance declarations;
4. Migration test reports;
5. Heavy metals analytical test reports;
6. PFAS declarations and analytical reports;
7. BPA/bisphenol supplier declarations;
8. MOSH/MOAH analytical reports.

UAB Ronelda

CEO

Edvardas Karžinauskas

UAB „RONELDA "Uosių g.126, Pagojo k.,
LT-86152 Kelmės r.

+37065751441
hello@cupernican.com

Įm.k. 304092351
PVM k. LT100010000512
Artea bankas, AB
LT027180200025467201
SWIFT code: CBSBLT26XXX