

28/03/2023

Nature Line Reusable Wood Fibre Cutlery

Manufacturer NATURE LINE CUTLERY OY

Declares that the products described below:

Product name	REUSABLE WOOD FIBRE CUTLERY
Raw material	UPM, EcoAce biocomposite; softwood fibres and wood waste derived ISCC certified bio-polypropylene / UPM WB50-60
Color	Natural brown or coloured with white masterbatch
Fiber source	Softwood fibres (spruce) from saw dust / UPM
Polymer source	Wood-based (Tall Oil) renewable Bio-PP / UPM/SABIC

Product description:

Reusable cutlery intended to come into repeated contact with dry, moist, fatty, and hot or cold foodstuffs, and hot and cold drinks. Products are suitable for use with alcohol, see migration test conditions below.

Manufactured in

Nature Line Cutlery Outokumpu Factory, Finland

And that the raw materials, packaging materials and finished products comply with the following requirements

EU REGULATIONS (EC):

EC N:o 178/2002 laying down the general principles and requirements of food law
EC No 1935/2004 on materials and articles intended to come into contact with food.
EC N:o 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
EU No 10/2011 on plastic materials and articles intended to come into contact with food as amended
EU No 1245/2020 amending and correcting *Regulation (EU) No 10/2011* on plastic materials and articles intended to come into contact with food

BUNDESINSTITUT FÜR RISIKOBEWERTUNG (BfR):

Recommendations no. XXXVI, 1-3 (2009)

EVIRA (Finnish Food Safety Authority) REGULATIONS:

10245/5 on packaging materials and food contact materials
17018/3 on control of food contact materials

Migration tests

In accordance with Commission Regulation EU No 10/2011, and hence Article 3 of European Regulation No. 1935/2004, the overall migration shall not exceed 10 mg/dm² from plastic materials and articles. According to the migration tests for repeated use, the wood fibre cutlery fills the requirements with the overall migration with three migration cycles in the following test conditions: 10% ethanol and 3% acetic acid for 2 hours at 70 °C, 95% ethanol for 2 hours at 60 °C and iso-octane for 30 minutes at 40 °C.

Compliance with migration limits

Overall Migration Limits and Specific Migration Limits of volatile substances meet migration limits for food contact articles. Tested by Eurofins Expert Services Oy, report no: EUFI29-20004776-T1 and

EUFI29-21000842-T2. SGS report No. 452-454/400004/2021/TR, before and after test according to DIN EN12875-1 standard for Mechanical dishwashing resistance of utensils.

Testing with reference to Regulation (EU) No 10/2011 and its amendments. Specific migration of Maleic acid and Maleic acid anhydride with reference to DIN EN ISO 10304-1 – method for the determination of dissolved anions with liquid ion chromatography, after migration with reference to DIN EN 13130-1.

Specific migration of Formaldehyde, tested with reference to Commission Regulation (EU) No 10/2011 and hence Article 3 of European Regulation No. 1935/2004. Tested by SGS, report no. 289-290/400251/2022/TR.

In accordance with Commission Regulation EU No 10/2011, and hence Article 3 of European Regulation No. 1935/2004, and Commission Regulation EU No 2020/1245, the migration of heavy metals and Primary Aromatic Amines (PAA) shall not exceed the limits that are set for it. Based on the heavy metals and PAA migration test, heavy metals or PAA do not dissolve from wood fibre cutlery.

The Sensory test (Sensorial examination of off-odour and off-taste) was performed in accordance with reference to DIN 10955:2004-06 tested by SGS, report No. 452-454/400004/2021/TR. Also, the flavour test and the odour test were performed in accordance with method EN 1230-2 and EN 1230-1 tested by Eurofins, report No. EUFI29-21000842-T2. According to the migration test, the product does not dissolve the any taste into food.

Determination of Bisphenol

Determination of Bisphenol A (2,2-bis(4-hydroxyphenyl) propane) and determination of Bisphenol F (4,4'-methylenediphenol). SGS In-House method, solvent extraction followed by analysis with HPLC-MS/MS. Tested by SGS, report no. 289- 290/400251/2022/TR.

Determination of formaldehyde and pesticides

Formaldehyde in wood, reference to EN 717-3:1996, and Determination of Pesticides, SGS In-House method RSTS-CHEM-210-1 with reference to US EPA Methods 8081B:2007 / 8141B:2007 / 8270D:2007 / 8321B:2007 / 3620B / 3630C, were tested by SGS, report 420/400311/2022/TR. None of these substances were detected in tests.

Absence Declaration

The products do not contain as additives any of the materials as referenced in the subject EU directives. None of these materials are generated during production. The absence of these substances is verified by analysis. Therefore, the requirements of EU Directive 2002/95/EC as amended are fulfilled.

REACH statement

NLC meets all the set requirements of REACH. Products have been evaluated against Regulation (EC) 1907/2006 of the European Parliament, "Registration, Evaluation, and Authorization of Chemicals (REACH), as interpreted by EU Court of Justice decision C-106/14 of 10 September 2015. Products, DO NOT CONTAIN any of the 233 REACH SVHCs as updated by ECHA on January 17, 2023 (<https://echa.europa.eu/fi/candidate-list-table>).

Packaging materials

The package consists of paper web and bio-based propylene or ethylene film both suitable for direct contact with food. Raw materials of package comply with all above regulations, and their amendments per date, effective in Finland and other regions. More information, DoC, test reports and statements of packaging materials are available by request

Dual use

No *dual use* substances have been added to the final product. More info about *dual use* substances, please read document of compliance of the raw material.

Daily use

Nature Line reusable cutlery storage and normal daily-use temperatures -20 - +100 °C. Dishwasher safe min. 125 cycles with 65°C washing temperatures in normal programs according EN12875-1, and microwave safe for reheating food according EN 15284:2007.

Outokumpu, 28/03/2023

Jarno Saarinen
EHQS Manager

This confirmation expires after 24 months or in the case of regulatory changes.