

Declaration of Conformity

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27/10/2025

Nature Line Reusable Biocomposite Cutlery

Manufacturer NATURE LINE CUTLERY OY

Declares that the products described below:

Product name	REUSABLE BIOCOMPOSITE CUTLERY
Raw material	Biocomposite material; lignocellulose and ISCC+ certified renewable bio-polypropylene / Woodcomposite Pure L50
Colour	Natural brown or coloured with masterbatch
Fiber source	Lignocellulose, cellulose and hemicellulose with lignin
Polymer source	Wood-based (Tall Oil) renewable Bio-PP

Product description:

Nature Line Cutlery products are reusable and suitable for repeated contact with dry, moist, fatty, and hot or cold foodstuffs, and hot and cold drinks. Products are suitable for use with alcohol. All products are fully traceable through their raw materials, packaging components, and colour specifications according to Regulation (EC) 1935/2004.

The raw material does not include wood flour or raw, unprocessed fibers. These components were excluded from the list of substances authorized for contact with food under the (EU) 2023/1442 amendment to Regulation 10/2011. All components utilized in the manufacturing of cutlery conform to this Regulation's stipulations. The details presented in this declaration reflect our expertise of manufacturing of reusable biocomposite cutlery. This declaration of conformity is also based on research findings, official confirmations and raw material testing's provided by the raw material manufacturer.

Manufactured in

Nature Line Cutlery, Outokumpu Factory, Finland

We hereby declare that the Nature Line Cutlery products comply with the following regulations

EU REGULATIONS:

- (EC) 178/2002 laying down the general principles and requirements of food law
- (EC) 1935/2004 on materials and articles intended to come into contact with food.
- (EC) 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food
- (EU) 10/2011 on plastic materials and articles intended to come into contact with food as amended. The latest amendment was issued on March 16, 2025
 - 2023/1442 amending and correcting *Regulation (EU) No 10/2011* on plastic materials and articles intended to come into contact with food
 - 2025/351 amending and correcting *Regulation (EU) No 10/2011* on plastic materials and articles intended to come into contact with food
- (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

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- (EU) 2023/988 on general product safety; European Parliament and of the Council of 10 May 2023 on general product safety as amended
- 94/62/EC of 20 December 1994 on packaging and packaging waste
- (EU) 2018/852 amending Directive 94/62/EC on packaging and packaging waste.

BUNDESINSTITUT FÜR RISIKOBEWERTUNG (BfR):

Recommendations no. XXXVI, 1-3 (2009). The latest amendment issued 01.08.2024

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

All product testing's have been conducted by an accredited laboratory in compliance with the requirements of Regulation (EU) No 10/2011. *

In compliance with Commission Regulation (EU) No 10/2011, and thereby in accordance with Article 3 of European Regulation (EC) No 1935/2004, the overall migration from plastic materials and articles must not exceed 10 mg/dm². Based on repeated-use migration tests, the bio-composite cutlery meets this requirement across three migration cycles under the following 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. Overall migration was tested using test method SGS In-house with reference to EN 1186-1:2002 and EU Regulation 10/2011. In EN 1186-3:2022, test methods are defined for determining overall migration in evaporable simulants. This Declaration of Conformity also takes into account the transitional provisions of Regulation (EU) 2025/351. Products placed on the market after March 16 2025, comply fully with the updated requirements. Material fully complies with Article 5 of Regulation (EU) 10/2011 as amended by Regulation (EU) 2025/351.

Compliance with migration limits

Overall Migration Limits and Specific Migration Limits of volatile substances **meet migration limits for food contact articles.**

Specific migration of Formaldehyde, tested with reference to Commission Regulation (EU) No 10/2011 and hence Article 3 of European Regulation No. 1935/2004.

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 19 heavy metals shall not exceed the limits that are set for it.

Primary Aromatic Amines (PAA) shall not exceed the limits that are set for it. Test results for heavy metals and PAA migration show that neither heavy metals nor PAA dissolve from the reusable biocomposite cutlery.

Polycyclic Aromatic Hydrocarbons (PAHs) content from selected plastic material and perfluoroalkyl and Polyfluoroalkyl substances (PFAS) were tested. None of these substances were detected.

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Tests requested	Test method / Reference	Reference limit / Permissible limit	Comment(s)
Overall migration	EN 1186-1:2002 and EU Regulation 10/2011	< 10 mg/dm ²	Pass
Specific migration of 19 heavy metals	EN 13130-1:2004 and EU Regulation 10/2011	See specific limits for each metal in the test report	Pass
Specific migration of Primary Aromatic Amines	EN 13130-1:2004 and EU Regulation 10/2011	See specific limits for each substance in the test report	Pass
Specific migration of Formaldehyde	EN 13130-1:2004 and EU Regulation 10/2011	< 15 mg/kg	Pass
Determination of polycyclic aromatic hydrocarbons (PAHs)	With reference to AfPS GS 2014:01 PAK.	See specific limits for each PAH-substance in the test report	Pass
Perfluoroalkyl and Polyfluoroalkyl substances (PFAS)	EN ISO 23702-1:2023, EN 17681-1:2022 and EN 17681-2:2022	See specific limits for each PFAS substance in the test report	Pass

The Sensory test (Sensorial examination of off-odour and off-taste) was performed in accordance with reference to DIN 10955:2024-01. According to the migration test, the product does not dissolve the any taste into food.

Specific migration of Maleic acid and Maleic acid anhydride with reference to DIN EN ISO 10304-1 was performed with reference to Regulation (EU) No 10/2011 and its amendments.

Tests requested	Test method / Reference	Reference limit / Permissible limit	Comment(s)
Sensory test (Sensorial examination of off-odour and off-taste)	DIN 10955:2024-01 and EU Regulation 1935/2004	Assessment from 0 to 2.75 (tolerable organoleptic impact)	Pass
Specific migration of Maleic acid and maleic anhydride	EN 13130-1:2004 and EU Regulation 10/2011	< 30 mg/kg	Pass

Determination of Bisphenol

Determination of Specific migration of Certain bisphenols and bisphenol derivatives was performed. The results confirm compliance with all migration limits. Test was performed with reference to Regulation (EU) No 2024/3190.

Tests requested	Test method / Reference	Reference limit / Permissible limit	Comment(s)
Specific migration of Certain bisphenols and bisphenol derivatives	EN 13130-1:2004 and EU Regulation 2024/3190	< 1 µg/kg	Pass

Determination of formaldehyde and pesticides

Formaldehyde in wood, reference to EN 717-3:1996, and Determination of Pesticides. None of these substances were detected in tests.

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Tests requested	Test method / Reference	Reference limit / Permissible limit	Comment(s)
Determination of Pesticides	SGS In-House method	No requirement	Pass
Formaldehyde in wood	EN 717-3:1996	No requirement	Pass

NIAS: Non-intentionally added substances

The term NIAS refers to chemicals found in products or materials that come into contact with food but have not been intentionally added during the production process. There are multiple sources for NIAS compounds, and they can be categorized as by-products, degradation products, and impurities. The analysis of non-intentionally added substances (NIAS) was carried out by an accredited testing laboratory, and none were detected during the tests. Analysis shows that products meet with the requirements of Regulation (EU) No. 10/2011 and Regulation (EU) No 2025/351.

Screening of Non-Intentionally Added Substances (NIAS)	EN 13130-1:2004 and EU Regulation 10/2011	See test report	Pass
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High degree of purity

All monomers and additives used in the polypropylene phase are verified to meet the requirement of a high degree of purity as defined in Article 5 of Regulation (EU) 2025/351. Analytical testing confirms absence of impurities, degradation products, and NIAS above detection limits.

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.

Functional barrier

No functional barrier used in products according to Regulation (EC) No 1935/2004.

Allergens

None of the ingredients used in the manufacturing of these products, nor the information provided by our suppliers, contain any of the food allergens specified in Annex II of Regulation (EU) No 1169/2011.

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 REACH SVHCs.

Packaging materials

The package consists of folding box board with or without renewable, bio-based plastic window, or, paper web and renewable, bio-based propylene or ethylene film. All packaging material are suitable for direct contact with food. Raw materials of package comply with all above regulations, and their amendments per

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date, effective in Finland and other regions. More information, DoC, test reports and statements of packaging materials are available by request.

Recycled materials

None of the materials used in the manufacture of our products or packaging contain recycled materials. All raw materials are sourced from virgin-grade suppliers and meet the requirements set forth by relevant food safety regulations, including Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food and Regulation (EU) No 2025/351. This is based on information provided by our suppliers and our internal quality assurance processes.

Dual use

No *dual use* substances have been added to the final product. For additional information on dual-use substances, refer to the compliance documentation of the raw material.

Daily use

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

Storage conditions

Storage in dry and clean conditions, no direct sunlight. Temperature between -20 to +50 °C.

Standards:

Nature Line Cutlery manufactures its products in accordance with the requirements of the following standards:

- BRCGS: Global Standard for Consumer Products – Personal Care and Household (Issue 4)
- ISO 22000:2018 - Food safety management system
- ISO 9001:2015 - Quality management system
- ISO 14001:2015 - Environment management system
- ISO 45001:2018 - Occupational Health and Safety management system

Outokumpu, 27/10/2025

*All tests conducted by an accredited laboratory SGS FIMKO OY

Certificates of Test Results (provided upon request)

360_400000203_2025_C

361_400000203_2025_C

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

Vaatimuksenmukaisuustodistus koskee seuraavia Ki-Sal Oy:n maahantuomia ja myymä tuotteita:

Ki-Sal tuotekoodi	Tuotekuvaus ja toimittajan tuotenumero
NLPKH	Puukuituhaarukka 800kpl/ltk (2004)
NLPKHSV	Puukuituhaarukka-veitsi setti 300kpl/ltk (3033)
NLPKKL-1000	Puukuitukahvilusikka,100kpl/pkt,1000kpl/ltk,(2304)
NLPKRL-700	Puukuituruokalusikka, 700kpl/ltk,(2204)