NORDTEK packaging ALL IN packaging ALL IN horeca

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DECLARATION OF COMPLIANCE FOR COSMETIC USE

ITEM: **104940 - Tube, 100 ml, white, with EVOH barrier, D40mm 40x120mm, with white flip top cap**

Herewith we confirm that for the production following statements apply:

Packaging material description

Laminate foil	white, w: 258 mm, DM40, foil thickness: 300 µm ± 30 µm, EVOH
UV coating	glossy, low-migration
Shoulder	40/10, push on, white, HDPE
Cap	40/3 fliptop, push on, white, PP

Laminate foil and membrane

Presence of substances prohibited / restricted under Annex II and Annex III of the EU Cosmetics Regulation (1223/2009/EU): no substances that are prohibited or restricted according to Annex II or Annex III of the EU Cosmetics Regulation 1223/2009 have been intentionally added to the laminate and therefore are not expected to be present at a level above 10 ppm.
Presence of skin sensitizers: substances classified as category 1 or B skin sensitizer according to CLP Annex VI table 3.1. are not expected to be present in the laminate at a level above 0.1%
Substances classified as category 1A skin sensitizers according to CLP Annex VI Table 3.1. are not expected to be present in the laminate in a concentration above 0.01%.
Substances classified as "CMR substances" under CLP Regulation (EC) No. 1272/2008 have not been intentionally added and are not known to be present at a level above 10 ppm.

UV coating

Used UV coating meets the requirements for the Regulation (EU) No. 1223/2009 and does not contain intentionally added components that are listed in Annex II and III of (EC) No. 1223/2009. Please consider that for technical reasons, UV coating contains the following non intentionally added substances listed in Annex II (EC) No. 1223/2009: TMPTA (CAS 15625-89-5) in concentrations below 2% and Phenothiazin (CAS 92-84-2) in concentrations below 0,005%.

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Plastic thread and cap

To the extent applicable to plastic intermediate materials in relation to the requirements of Cosmetic Regulation (EC) No. 1223/2009 we can confirm that:

- substances classified as CMRs Category 1A, 1B or 2 according Regulation (EC) 1272/2008 Annex VI table 3.1 are not intentionally used in the manufacture or the formulation of this products at levels that, at the best of our knowledge could lead to exceed the quantity of 1 ppm in this product.
- substances banned or restricted in Annex II or III of the Cosmetic Regulation (EC) No. 1223/2009 are not intentionally use in the manufacture or the formulation of this product at levels that, at the best of our knowledge, could lead to exceed the quantity of 10 ppm in this product.
- substances classified as Skin Sensitizer Category 1, 1A, 1B or 2 according to CLP Regulation (EC) 1272/2008 Annex VI table 3.1 are not intentionally used in the manufacture or the formulation of this products at levels that, at the best of our knowledge, could lead to exceed the quantity of 100 ppm in this product.

Overall migration limits

Analyzed values in connection with your products can be found below.
The overall migration limit was set under the following conditions: 10 days, 40°C
The specific migration limit was set under the following conditions: 10 days, 60°C

Overall migration of substances (mg.dm-2)

Simulants	Results
B: 3% acetic acid	< 1,5

Simulants	Results
95% ethanol	< 1,5
Isooctane	< 1,5

Content of certain epoxy derivates - BADGE, BFDGE, NOGE (mg.dm-^{2})

Simulants	BADGE	BFDGE	NOGE (3 ring)
Isooctane	< 0,0002	< 0,0004	< 0,0015

Content of bisphenol A (mg.dm-2)

Simulants	Results
95% ethanol	< 0,0003

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Content of formaldehyde (mg.dm-2)

Simulants	Results
B: 3% acetic acid	< 0,50

Content of primary aromatic amines (mg.dm-²)

Simulants	Results
B: 3% acetic acid	< 0,0004

The assessment is based on laboratory migration tests carried out in accordance with EU food contact legislation (EN 1186, Regulations (EC) No. 1935/2004 and (EC) No. 1895/2005) and serves as a basis for evaluating the suitability of the packaging for use in the cosmetics industry in compliance with Regulation (EC) No. 1223/2009. The analyzed values are linked to laboratory assessment report No. 126/S-096.

Allergens

Substances listed in Annex II of Regulation (EU) No 1169/2011 are not used in the manufacture or in the composition of this product.

Bisphenol A (BPA)

The laminate foil supplier states in its declaration that BPA may be present only in trace amount out of technical processing; after curing of the material, BPA is not detectable. The shoulder and cap supplier declare that BPA is not intentionally added or used in the manufacture or composition of this product.

Genetically modified organism (GMO)

GMO's are not intentionally used or added during the manufacturing process and are not present in any raw materials or products.

Heavy metals

The product complies with the applicable requirements for heavy metals under Directive 94/62/EC on packaging and packaging waste. Lead, mercury, cadmium and hexavalent chromium are not intentionally added to the product. The sum of the incidental concentration levels of these substances does not exceed 100 mg/kg (ppm) by weight. The product is designed to comply with the requirements of Regulation (EU) 2025/40 on Packaging and Packaging Waste (PPWR), which become applicable on 12 August 2026, including the requirement that the sum of the concentrations of lead, cadmium, mercury and hexavalent chromium does not exceed 100 mg/kg by weight.

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Mineral Oil Saturated Hydrocarbons and Mineral Oil Aromatic Hydrocarbons (MOSH & MOAH)

MOSH & MOAH are not intentionally used during the manufacturing process of these products and is not present in the raw materials use.

Nanomaterials

Nanomaterials are not intentionally used in raw materials, products or during manufacturing processes.

Phthalates

The cap supplier states in its declaration that phthalates are not intentionally used as additives; however, trace amounts may be present in some polypropylene grades as catalyst modifier residues, with a maximum residue level not exceeding 0.25 ppm.
The laminate foil and cap supplier declare that phthalates are not intentionally used in raw materials, products or during manufacturing processes.

PFAS - Per- and polyfluoroalkyl substances

Based on declarations from our suppliers and our current knowledge of our manufacturing processes, the materials used in our laminated tubes are not expected to contain PFAS or exceed the limits currently under discussion within the framework of the EU Packaging and Packaging Waste Regulation (PPWR), specifically Article 5.
The restrictions under Article 5 of the PPWR (Regulation (EU) 2025/40) apply exclusively to packaging materials intended for direct contact with food (PFAS technical documentation and laboratory testing).

PPWR - Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste

The requirements of Article 5 of the PPWR will be applied in accordance with the applicable legislation and available guidance issued by the European Union. At present, technical documentation and laboratory testing relating to PFAS are required only for packaging intended to come into contact with food.
With regard to the recyclability and packaging design requirements under Articles 5 to 12 of the PPWR, it should be noted that several implementing acts, harmonised methodologies and detailed technical criteria are still under development at EU level. Therefore, certain requirements including the official recyclability assessment system (Classes A-E), harmonised labelling requirements and the introduction of the Digital Product Passport (DPP) - have not yet been fully finalised or become applicable.

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The respective obligations will enter into force progressively in 2027, 2028 and 2030, depending on the specific provision of the Regulation.

Recycling

The packaging is made of a multilayer material, whose recyclability depends on its composition and the availability of local recycling infrastructure.
Packaging markings and recycling-related symbols are applied according to customer-approved artwork specifications. As TUBAPACK, a.s. acts exclusively as the packaging manufacturer and does not create, modify or approve customer artwork, the selection and approval of mandatory labelling elements remain under the responsibility of the customer/brand owner. Final regulatory approval of the artwork remains with the customer.

Substances of very high concern

The legal requirements according to Regulation (EC) No 1907/2006 (REACH) are fulfilled. Based on information received from our suppliers, this product does not contain any of the substances identified and included by the European Chemicals Agency (ECHA) in the Candidate List of Substances of Very High Concern for authorization in quantities equal to or higher than 0,1%.

Budapest, 2026.08.13.

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