

**Registered Office Address:**

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DECLARATION OF CONFORMITY NO: VEGWARE-DOC-2026_31-V1

for materials and articles intended to come into contact with food 

This declaration is issued in accordance with Article 16(1) of Regulation (EC) No 1935/2004 and Article 5 of the Commission Regulation (EU) 2025/40 of 19 December 2024 on packaging and packaging waste, also known as Packaging and Packaging Waste Regulation (PPWR).

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Date of the declaration: 31.07.2026

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This Declaration of Conformity is issued under the sole responsibility of Vegware.

SUBJECT OF THE DECLARATION AND PACKAGING IDENTIFICATION

Packaging type: Primary packaging

Photograph or technical drawing reference: Vegware product specification sheets (available upon request)

Material composition: Wood fibre-based paperboard/ bio-based coating (virgin, bleached, unprinted material)

*This declaration also applies to other materials present in trace amounts within the packaging composition, such as additives, inks, and glues, where applicable.

Product Code	Description	Category	Subcategory	Packaging weight
VP-SP4.5	4.5in/115mm compostable paper teaspoon	CUTLERY	Paper cutlery	1.79g
VP-FK6.2	6.6in compostable paper fork	CUTLERY	Paper cutlery	3.53g
VP-KN6.2	6.7in compostable paper knife	CUTLERY	Paper cutlery	3.98g
VP-SP6.2	6.7in compostable paper spoon	CUTLERY	Paper cutlery	4.13g
VP-SP3.5	3.5in/90mm compostable paper ice cream spoon	CUTLERY	Paper cutlery	1.7g
VP-SP3.5C	3.5in/90mm tutti frutti paper ice cream spoon	CUTLERY	Paper cutlery	1.7g
VP-KFSWN	Compostable paper cutlery kit	CUTLERY	Paper cutlery	9.12g
VP-KFWN	Compostable paper knife and fork kit	CUTLERY	Paper cutlery	12.4g
VP-SP3.5CW	3.5in/90mm tutti frutti paper ice cream spoon, wrapped	CUTLERY	Paper cutlery	1.7g

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COMPLIANCE WITH LEGISLATION

We hereby declare, under our sole responsibility, that the packaging specified in this declaration, where applicable and under foreseeable conditions of use, conforms to the current applicable requirements of relevant legislation, including:

- ✓ **Commission Regulation (EC) 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.
- ✓ **Commission Regulation (EC) 2023/2006** of Commission of 22nd December 2006 amended on good manufacturing practices for materials and articles intended to come into contact with food.
- ✓ **Commission Regulation (EU) No 10/2011** of 14 January 2011 on plastic materials and articles intended to come into contact with food, and its amendments.
- ✓ **Commission Regulation (EU) 2025/351** of 21 February 2025 amending Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, amending Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods, and repealing Regulation (EC) No 282/2008, and amending Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food as regards recycled plastic and other matters related to quality control and manufacturing of plastic materials and articles intended to come into contact with food.
- ✓ **Commission Regulation (EU) 2024/3190** of 19 December 2024 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives.
- ✓ **Recommendation XXXVI** of BfR on papers and boards intended to come into contact with Foodstuffs (version of 1st of June 2019).
- ✓ **Regulation (EC) No 1907/2006, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)**. We hereby confirm that the products listed in this declaration do not contain any substances included on the list of Substances of Very High Concern (SVHC) in concentrations exceeding 0.1% (w/w).
- ✓ **Commission Regulation (EU) 2025/40** of 19 December 2024 on packaging and packaging waste, also known as **Packaging and Packaging Waste Regulation (PPWR)**.

Compliance with the substance restrictions laid out in Article 5 of the PPWR:

1. Heavy metals

The total concentrations of lead (Pb), cadmium (Cd), mercury (Hg), and hexavalent chromium (Cr(VI)) in these packaging materials do not exceed 100 mg/kg, in accordance with Articles 5(2) and 5(3) of the PPWR.

2. PFAS restrictions

These packaging materials are free from per- and polyfluoroalkyl substances (PFAS) exceeding the thresholds specified in the PPWR.

- < 25 ppb for individual PFAS (targeted analysis).
 - < 250 ppb for the sum of PFAS (after degradation of precursors, if applicable).
 - < 50 ppm for total PFAS content (including polymers).
- as specified in Article 5(5) PPWR.

the Italian legislation:

- ✓ **21/3/1973 Ministerial Decree** and following updating and changes.
- ✓ **777/82 DPR** and following updating and changes.

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the American Legislation:

- ✓ **FDA 21 CFR 176.170** - Paper and paperboard.
- ✓ **FDA 21 CFR 175.300** - Total extractives.

NOTIFIED BODY CERTIFICATES

Not applicable.

OVERALL MIGRATION

According to Regulation (EC) No 10/2011 materials and articles, the overall migration does not exceed 10 mg per 1 dm² of surface area of the packaging or 60 mg per 1 kg of foodstuff or food simulant.

SPECIFIC MIGRATION

A risk assessment according to Article 19 of Regulation (EC) No. 10/2011 was performed on these products.

Specific migration testing has been performed in accordance with the applicable regulatory requirements, and all assessed parameters were found to be within the prescribed limits.

DUAL USE ADDITIVES, NIAS AND ALLERGENS

Our products do not contain any non-intentionally added substances.

No substances capable of causing allergies are intentionally added in the production process.

Our manufacturing facilities do not intentionally incorporate major food allergens into our products, such as milk, eggs, fish, shellfish, nuts, wheat, soy, peanuts, sunflower seeds, or any meat-derived products including beef or pork. We believe that the raw materials utilised in the production of our goods do not contain these allergens, and that there is no risk of contamination of the products. This statement is made in good faith and is believed to be accurate to the best of our knowledge.

COMPLIANCE OF SUBSTANCES SUBJECT TO PURITY CRITERIA

There are no substances subject to purity criteria. There are no substances subject to restrictions.

CONDITIONS OF USE

Paper cutlery is suitable for direct contact with dry, water, acid, alcoholic, dairy and fatty food in a temperature up to 80°C for 0.5h.

The customer should perform their own evaluations to verify the suitability of the product for their own proposed application.

We encourage to request product samples and perform own evaluations to verify the suitability of product for own proposed application, as each kitchen is different, so samples allow to test Vegware with a menu offering and see they work in ovens, microwaves, refrigerators, and freezers.

TRACEABILITY (EU PACKAGING AND PACKAGING WASTE REGULATION (PPWR))

Vegware product identification is carried out throughout the supply chain via clear markings on the outer cartons. Applying identification marks directly onto individual items is technically unfeasible due to their size or technological limitations. Each case is accompanied by a label, which is a document detailing the packaged product. This label includes the product type, batch number, Vegware name, trademark, and postal address. Furthermore, each Vegware item is branded and contains an internal identification of the manufacturing site, represented by a 'leaf' mark and a corresponding number. Based on these measures, Vegware considers the packaging identification and traceability requirements of Article 15 of Regulation (EU) 2025/40 (PPWR) to be fulfilled.

DOCUMENT SIGN OFF

This declaration is valid from the date specified below and shall only be replaced in the event of significant modifications to the product's composition that affect essential conformity requirements. It shall also be replaced if the legislative references mentioned in this declaration are amended or updated, necessitating a new conformity assessment.

Date of issue: 31.07.2026

Issued by: Cora Moran, Quality & Compliance Specialist

Place of issue: Edinburgh, Scotland, UK

Signature: 



Information given in this declaration is based on data (REACH compliance declarations, materials' MSDS, analytical test reports for heavy metal concentrations, and PFAS test reports or supplier declarations and other documentation) received from our raw material suppliers as well as analysis performed on representative samples. This declaration further confirms that Vegware possesses technical documentation in accordance with Annex VII of the PPWR, demonstrating compliance with the above requirements.