

DECLARATION OF CONFORMITY

Food Contact Materials – EU Regulations (EC) No. 1935/2004, (EU) No. 10/2011 and (EU) 2025/40

1. Manufacturer

EURO STRAWS SE, ID No.: 08336458, VAT No.: CZ08336458

Evropska 516/10, 160 00 Praha 6, Dejvice / Zámecká 964, 348 15 Planá u Mariánských Lázní, Czech Republic

Registered in the Commercial Registry kept by the Municipal Court in Prague, Section H, Insert 2268

2. Products Covered

Fibre Drinking Straws (reusable) under the trade name “**EUROSTRAWS**” in colours **Natural** and **Black**.

The products are intended for repeated use in short-term contact with beverages.

3. Material Composition

The products are composed of a compostable aliphatic copolyester compound. The compound comprises:

- 60–70% compostable aliphatic copolyester
- 30–40% mineral filler (food-grade talc)
- 0–2% lubricant based on modified biobased fatty acids
- 0–10% highly purified food-contact approved cellulose fibres

The products do not contain: PLA • BPA • GMO materials • Plasticisers • PVC

This is not a multi-layered product and no functional barrier is used in the product.

4. Regulatory Framework

EURO STRAWS SE declares that the above products comply with the requirements of:

- Act No. 258/2000 Coll., on the protection of public health (Czech Republic)
- Decree of the Ministry of Health No. 38/2001 Coll., on hygienic requirements for products intended to come into contact with food
- 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
- Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food, including Section 3.3.2 (articles intended for repeated use)
- Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste, in particular Article 5 regarding per- and polyfluoroalkyl substances (PFAS)

5. Tests and Certification

Test Report 1 – General food contact compliance (LFGB / EU 1935/2004)

Certification authority: SGS (LFGB)

Test report number: 6896103

Testing period: 25 April 2024 – 13 May 2024

Result: The material complies with the conditions and limits for contact with food in all tested parameters.

Test Report 2 – Targeted specific migration testing (EU 10/2011, Art. 11 / Section 3.3.2)

Testing authority: LABTECH s.r.o., Hygienická laboratoř Klatovy, Koldinova 14, 339 01 Klatovy

Protocol number: 1684/2026

Testing period: 11 February 2026 – 6 March 2026 (protocol issued 24 March 2026)

Product tested: "EUROSTRAWS" Black straw. Both Natural and Black colour variants are manufactured from the same base material composition and this test result applies to both.

Test conditions: 70°C, 2 hours, three successive extractions; simulants B (3% acetic acid) and D1 (50% ethanol); S/V ratio 6 dm²/kg

Substances tested and results:

- 1,4-Butanediol (1,4-BDO): <1 mg/kg in all six extractions (SML: 5 mg/kg per EU 10/2011 Annex I)
- Tetrahydrofuran (THF): <0.1 mg/kg in all six extractions (SML: 0.6 mg/kg per EU 10/2011 Annex I)

Compliance verdict: Specific migration values of all tested substances comply with the requirements of Commission Regulation (EU) No. 10/2011, Section 3.3.2 (repeated use articles). No increase in migration was observed across successive extractions, confirming suitability for repeated use.

6. PFAS Compliance

EURO STRAWS SE confirms, on the basis of declarations received from its raw material supplier, that the materials used in the manufacture of EUROSTRAWS Fibre Drinking Straws do not contain per- and polyfluoroalkyl substances (PFAS), whether added intentionally or non-intentionally, and that PFAS are not suspected to be present as impurities. The products therefore comply with the requirements of Regulation (EU) 2025/40, Article 5.

7. Conditions of Use

- Safe for contact with food and beverages for a minimum of 2 hours at temperatures up to 70°C
- **Manufacturer's recommendation: do not use in drinks exceeding 60°C**
- Storage: dry place, 0–30°C

8. Statement of Conformity

On the basis of the test results set out above, no substance subject to a specific migration limit under the relevant Regulations has been found to exceed the allowable limit. EURO STRAWS SE hereby confirms that the above-described products comply with all applicable requirements of the Regulations listed in Section 4. This Declaration is issued on the basis of good manufacturing practices and the documentary evidence referenced herein, in accordance with Article 15 of Regulation (EU) No. 10/2011 and Point 7 of Annex IV to Regulation (EC) No. 1935/2004.

23 July 2026



Adrian Todd

Euro Straws SE