

DECLARATION OF COMPLIANCE

for materials and articles intended to come into contact with food

Manufacturer:

CONFIDENTIAL
[Redacted]
[Redacted]
[Redacted]

Customer:

Starry Team LTD
Registration No: 206256695
Address: Bulgaria, Varna, 9010,
str. Prilep 173

Products Covered:

BAMBOO BABY PLATE WITH SILICONE SUCTION, BAMBOO BABY BOWL WITH SILICONE SUCTION, BAMBOO BABY SPOON WITH SILICONE TIP, BAMBOO BABY FORK WITH SILICONE TIP, BAMBOO CUP WITH SILICONE INSIDE, WOODEN KIDS KNIFE

Product Identification:

Item/Style Numbers: 0664918889838, 0664918889845, 0664918889852, 0664918889869, 0664918889876, 0664918889883, KD029, KD012, KU029, 51720

Materials (as identified in test reports):

- Bamboo/Wood substrate (SGS sample 002, Intertek component 1)
- Transparent lacquer coating on bamboo/wood (SGS sample 001)
- Silicone - food contact components (SGS sample 003 "Pink silicone", Intertek component 2 "Silicone rubber")

Regulatory Compliance

We hereby confirm that the products listed above are manufactured in compliance with the general safety requirements of the following European regulations for materials and articles intended to come into contact with food:

- REGULATION (EC) No 1935/2004** - Framework Regulation on FCM (Article 3 general safety requirement)
- COMMISSION REGULATION (EC) No 2023/2006** - Good Manufacturing Practice (GMP)
- REGULATION (EC) No 1907/2006** - REACH (no SVHCs above 0.1% w/w)

Product tested in accordance with:

- EN 14372:2004** - Child use and care articles - Cutlery and feeding utensils - Safety requirements
- German LFGB §30 & §31** - German Food, Articles of Daily Use and Feed Code, with BfR Recommendations

Test Results Summary

The compliance of the above products has been verified through independent laboratory testing (SGS, Intertek). Results are organized by material type as specifically identified in the test reports.

A. SILICONE COMPONENT TESTING

Tested material: Pink silicone (SGS sample 003), Silicone rubber (Intertek component 2)

A1. Volatile Organic Matter (Silicone-specific)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003), Intertek Report No. SHAH01700206 (component 2)

Note: VOM test per BfR Recommendation conducted at 200°C for 4 hours, specific to silicone material.

Test Item	Method/Condition	BfR Limit	Result	Status
Volatile Organic Matter (SGS sample 003 - Silicone)	BfR method 200°C, 4 hours	0.5% (w/w)	0.22% (w/w)	PASS
Volatile Compounds (Intertek - Silicone rubber)	EN 14372 Gravimetric	0.5% (w/w)	0.3% (w/w)	PASS

A2. Extractable Components (Silicone)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003 - Pink silicone)

Note: Limit of 0.5% (w/w) per BfR Recommendation. EU Framework Regulation (EC) 1935/2004 does not specify numeric OML for non-harmonized materials like silicone.

Simulant	Condition	BfR Limit	Result	Status
Distilled Water	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS
3% Acetic Acid (w/v)	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS
10% Ethanol (v/v)	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS

A3. Heavy Metals Content (Silicone)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003), Intertek Report No. SHAH01700206 (component 2)

Element	Method	Result (SGS)	Result (Intertek)	Status
Lead (Pb)	ICP-OES	ND (<2 mg/kg)	ND (<5 mg/kg)	PASS
Cadmium (Cd)	ICP-OES	ND (<2 mg/kg)	ND (<5 mg/kg)	PASS

A4. Bisphenol A Content (Silicone)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003 - Pink silicone)

Test Item	Method	MDL	Result	Status
Total Content of BPA (Silicone component)	HPLC-MS	0.1 mg/kg	ND (Not Detected)	PASS BPA FREE

A5. Polycyclic Aromatic Hydrocarbons (Silicone)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003 - Pink silicone) | Method: GC-MS

Test Item	Limit	Result	Status
Sum of 18 PAHs (silicone)	1.0 mg/kg	ND (all compounds)	PASS
Benzo(a)pyrene	0.2 mg/kg	ND (<0.1 mg/kg)	PASS

A6. Sensory Evaluation (Silicone)

Reference: Intertek Report No. SHAH01700206 (Silicone rubber - component 2) | Method: DIN 10955:2004

Test Item	Limit	Result	Status
Odour (Silicone)	≤2.5 points	0 points	PASS
Taste (Silicone)	≤2.5 points	0 points	PASS

A7. Colour Release (Silicone)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 003 - Pink silicone)

Test Item	Simulant	Limit	Result	Status
Visible Colour Migration (Silicone)	Distilled Water	Negative	Negative	PASS

B. BAMBOO/WOOD SUBSTRATE TESTING

Tested material: Transparent coated bamboo (SGS sample 001), Brown bamboo (SGS sample 002), Natural color wood (Intertek component 1)

B1. Overall Migration / Extractable Components (Coated Bamboo/Wood)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 001 - Transparent coated bamboo/wood)

Note: Limit of 0.5% (w/w) per BfR Recommendation for wood/plant-based materials. EU Framework Regulation (EC) 1935/2004 does not specify numeric OML for non-harmonized materials; Council of Europe guidance suggests 10 mg/dm² as general benchmark.

Simulant	Condition	BfR Limit	Result	Status
Distilled Water	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS
3% Acetic Acid (w/v)	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS
10% Ethanol (v/v)	70°C, 2 hrs	0.5% (w/w)	<0.1% (w/w)	PASS

B2. Specific Migration of Formaldehyde (Bamboo/Wood)

Reference: SGS Report No. GZHL2007040206CW-01 | Method: EN 13130-1:2004, UV-Vis | Intertek Report No. SHAH01700206

Test Item	Simulant	Condition	Limit	Result	Status
Formaldehyde Migration (SGS - Bamboo)	3% Acetic Acid	70°C, 2 hrs (3rd migration)	15 mg/kg	0.2 mg/kg	PASS
Formaldehyde Release (Intertek - Wood)	Multiple simulants	Per EN 14372	15 mg/kg	<10 mg/kg	PASS

B3. Total Arsenic, Pentachlorophenol & Pesticides (Bamboo/Wood)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 002 - Brown bamboo)

Test Item	Method	Limit	Result	Status
Total Arsenic (As)	US EPA 3052:1996, ICP-MS	Not Detected	ND (<2 mg/kg)	PASS
Pentachlorophenol (PCP)	LFGB BVL B 82.02.8, GC-MS	5 mg/kg	ND (<0.05 mg/kg)	PASS
Pesticides	US EPA 8081B, GC-MS	Not Detected	ND	PASS

C. COATING/VARNISH TESTING

Material: Transparent lacquer coating on bamboo/wood (SGS sample 001). Note: Coating chemical type not further specified in test reports.

C1. Lead Content in Coating

Reference: SGS Report No. T52010210190TY | Method: CPSC-CH-E1003-09.1

Test Item	Limit	Result	Status
Lead (Pb) in coating (transparent lacquer)	90 ppm	ND (<10 ppm)	PASS

C2. Colour Release (Coated Bamboo)

Reference: SGS Report No. GZHL2007040206CW-01 (sample 001 - Transparent coated bamboo)

Test Item	Simulant	Limit	Result	Status
Visible Colour Migration	2% Acetic Acid	Negative	Negative	PASS
Visible Colour Migration	Coconut Oil	Negative	Negative	PASS

D. MIGRATION OF CERTAIN ELEMENTS (EN 14372:2004)

Reference: Intertek Report No. SHAH01700206 | Method: Acid extraction, ICP-OES | Tested on all materials

Element	EN 14372 Limit	Wood (1)	Silicone (2)	Status
Soluble Lead (Pb)	25 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Cadmium (Cd)	20 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Arsenic (As)	10 mg/kg	ND (<2.5 mg/kg)	ND (<2.5 mg/kg)	PASS
Soluble Barium (Ba)	100 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Antimony (Sb)	15 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Chromium (Cr)	10 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Mercury (Hg)	10 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS
Soluble Selenium (Se)	100 mg/kg	ND (<5 mg/kg)	ND (<5 mg/kg)	PASS

E. MELAMINE CONTENT

Reference: SGS Report No. GZHL2109039566CW-01 | Method: FTIR per ASTM E1252-98(2021)

Test Item	Method	Result	Status
Melamine Identification (All materials)	Fourier Transform Infrared Spectrometer (FTIR)	Characteristic peaks of Melamine were NOT found	PASS MELAMINE FREE

F. CHILD SAFETY REQUIREMENTS (EN 14372:2004)

Reference: Intertek Report No. SHAH01700206

Test Item	Requirement	Result	Status
Visual and Tactile Examination	No defects	No defects found	PASS
Sharp Points	No sharp points	No sharp points	PASS
Sharp Edges	No sharp edges	No sharp edges	PASS
Small Parts	No small parts	No small parts	PASS
Tensile Strength	Per EN 14372 cl. 5.3.1	Compliant	PASS
Torque Test	Per EN 14372 cl. 5.3.2	Compliant	PASS
Drop Test	Per EN 14372 cl. 5.3.5	Compliant	PASS

G. PHTHALATES CONTENT

Reference: SGS Report No. T52010210190TY | Method: GC-MS per CPSC-CH-C1001-09.4

Substance	Limit	Result	Status
DEHP, DBP, BBP, DINP, DIBP, DnHP, DPENP, DCHP	<0.1% each	ND (<0.003%)	PASS

Important Notes and Limitations

Standards Applied: Testing was conducted per German LFGB/BfR Recommendations and EN 14372:2004. The 0.5% (w/w) extractable components limit is a German BfR requirement; EU Framework Regulation (EC) 1935/2004 does not specify numeric overall migration limits for non-harmonized materials such as bamboo, wood, or silicone. Council of Europe guidance suggests 10 mg/dm² as a general benchmark.

This declaration is based on the test results from the referenced laboratory reports.

Supporting Test Reports

- **GZHL2109039566CW-01** (SGS-CSTC) - Melamine Identification
- **GZHL2007040206CW-01** (SGS-CSTC) - LFGB Food Contact Compliance (samples 001-003: coating, bamboo, silicone)
- **T52010210190TY** (SGS-CSTC) - US CPSC Physical/Chemical Safety, Lead in Coating, Phthalates
- **SHAH01700206** (Intertek) - EN 14372 Child Cutlery and Feeding Utensils (components 1-2: wood, silicone)

General Information

The manufacturing of the products is carried out according to Good Manufacturing Practice (GMP) in accordance with COMMISSION REGULATION (EC) No 2023/2006. Traceability is guaranteed at all stages through proper documentation and quality control systems. This declaration is based on the test results and information available. It is the responsibility of the downstream user to ensure that the final application complies with all applicable regulations.

Manufacturer Confirmation

Authorized Signature: **CONFIDENTIAL**

Name: **CONFIDENTIAL**

Position: Company Manager

Date: 26.01.2026

Abbreviations: ND = Not Detected (less than MDL); MDL = Method Detection Limit; mg/kg = milligram per kilogram (ppm); w/w = weight by weight; LFGB = German Food, Articles of Daily Use and Feed Code; BfR = German Federal Institute for Risk Assessment; PAHs = Polycyclic Aromatic Hydrocarbons; VOM = Volatile Organic Matter; PCP = Pentachlorophenol; BPA = Bisphenol A; FCM = Food Contact Materials; SVHC = Substances of Very High Concern; CoE = Council of Europe