

DECLARATION OF COMPLIANCE FOR FOOD CONTACT MATERIALS

46062790

CanBody with Open-Top End Ø 153x246mm

1° Packaging material description

From external to internal:

Body:

- Gold epoxy Lacquer B05
- Tinfoil, 0.270mm, E 2.8/2.8 (functional barrier)
- Gold polyester Lacquer 08C BPA NIA
- White powder Side Stripe 08P BPA NIA

Factory end:

- Gold epoxy Lacquer B05
- Tinfoil, 0.280mm, E 2.8/2.8 (functional barrier)
- Gold polyester Lacquer 08C BPA NIA
- Waterbased sealing compound in the seam area

Produced by Trivium Packaging France SAS
Pont de Laer
29350 Moëlan sur mer
France

Trivium Packaging France SAS.
Route de Saint Mard
BP 9
80700 Roye
France

2° Intended food contact

Custard cream

This certificate mentions food types only in the context of regulatory compliance of our products for these food types. The type of food dictates the choice of simulant used to carry out migration testing as part of this compliance assessment.

This declaration does not make a recommendation of the suitability of our products or the predicted shelf-life for particular filling goods, such a recommendation requires a pack testing.

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230918 DoC 46062790 3P Canbody OT end 153x246mm 08C BPA NIA.docx

Disclaimer:

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3° General storage condition for empty cans and ends

The advised storage period of Trivium products is 24 months after date of manufacturing*. The storage period is applicable under the storage conditions which are explained below. If a product exceeds the advised period, the product must be tested.

* Cans and ends with 'meat-release' lacquers require other storage conditions and have a different useful life. Storage conditions and useful life of products with "meatrelease" lacquering should be determined together with a Trivium representative.

For cans and ends which are constantly stored at high temperatures and at very high humidity (above 75%) an advised storage period of 1 year applies.

TRIVIUM Products			
Cans		Ends	
Temperature	= 5-45°C	Temperature	= 5-45°C
Relative Humidity	= 25-75%	Relative Humidity	= 25-75%
Temperature peaks	= Max. 10°C in 24 hours	Temperature peaks	= Max. 10°C in 24 hours

In general, besides the specified storage conditions, great care must be given to the storage of cans and ends in warehouses to eliminate the chance of damage.

Precautions must be taken to ensure cans and ends remain clean, dry and dust-free. Measures should be in place for good pest-control. Attention also must be given to limit possible damage which may compromise the integrity and suitability of the materials for future processing.

4° Legal compliance

a) Europe

Compliance with Framework Regulation (EU) No 1935/2004/CE of 27th October 2004 on material and articles intended to come into contact with food and 2023/2006 of 22nd December 2006 on good manufacturing practices.

The starting materials of the lacquers are chosen by our suppliers to comply:

- either, with reference to European « plastic » directives which do not directly apply to organic coatings for metal packaging: Commission Regulation (EU) N° 10/2011 amended by Commission Regulations (EU) N° 321/2011, 1282/2011, 1183/2012, 202/2014, 865/2014, 2015/174, 2016/1416, 2017/752, 2018/79, 2018/831, 2019/37, 2019/1338, 2020/1245 and 2023/1442 (as a guideline).
- or with the "Code of Practice for coated articles where the food contact layer is a coating", CEPE working document (Edition N°4: 2/2/2009).
- or with Council of Europe Resolution AP (2004)1.

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Compliance with

- Commission regulation (EU) 2018/213 of 12th February 2018 on the use of bisphenol A in varnishes and coatings intended to come into contact with food and amending Regulation (EU) No 10/2011 as regards the use of that substance in plastic food contact materials.
- Specific EC Directives or Regulations,
 - 1895/2005 BADGE/NOGE,
 - 1/2004 Azodicarbonamide, deleted and replaced by EC Regulation 10/2011,
 - 142/1978 Vinyl Chloride,
 - 11/1993 EEC nitrosamines in rubbers,
 - 1881/2006 tin in canned food stuffs.
- Compliant with EN 10333 (Tinplate).
- European Directive 94/62/EC about Heavy Metals.

Our can and ends are made with coatings and compounds formulated without phthalates plasticizers without parabens and without nanoparticles.

Lacquers and Inks used on the external side of these cans have been chosen according to recommendations of EuPIA described in "Guideline on Printing inks applied to the non-food contact surface of food packaging" and are in compliance with the "exclusion list for printing inks and related products" of The European Council of Paint, Printing inks and Artists Colours Industry (CEPE).

i - Overall migration

Measured according to EN 1186, referring to EC Directives 85/572 and 82/711 as amended by EC Directives 93/08, 97/48 and 2007/19 annex VIII until 1st January 2013;

Directive 85/572 and 82/711 were replaced by Commission Regulation (EU) 10/2011 and corresponding simulants.

Results of the migration tests into relevant food simulants:

This type of coating is intended to come into contact with different types of food.

Test conditions	Simulant	Average value in mg/ dm ²
1h at 130°C + 10 days at 40°C	10% Ethanol	2.7
1h at 130°C + 10 days at 40°C	50% Ethanol	1.4
2h at 175°C + 10 days at 40°C	Olive oil	8.0

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3% acetic acid simulant can't be used on a corrodible substrate as aluminium, Electrolytic tinplate or Tin-free steel, 10% Ethanol is used as alternative according Standard WP CEN/TS 14235 and JRC Migration testing Guidelines Version 6.2.

Notes: remind of the authorized maximum limits:

- For fatty simulants: 10mg/dm² with an analytical tolerance 3mg/dm²
60mg/kg with an analytical tolerance 20mg/kg
- For aqueous simulants: 10mg/dm² with an analytical tolerance 2mg/dm²
60mg/kg with an analytical tolerance 12mg/kg

For fatty foods a corrective factor, at least equal to 3, is applicable for certain type of foods, among them vegetables, according XP CEN TS 1435.

In the conditions of test, the overall migration of this material is within the limits set by regulations in the simulants representing aqueous, acidic, non-alcoholic and fatty foods.

This test gives no recommendation on the chemical resistance of the article.

ii - Specific migration

- List of monomers/additives **having a restriction** (in current Directives as amended by date):

Name of Monomer/Additive	CAS N°	EU Restriction, e.g. Specific migration limit	Specific migration value
Terephthalic acid	100-21-0	SML = 7.5mg/kg	0,11mg/kg
Caprolactam	105-60-2	SML(T) = 15mg/kg	ND (<3mg/kg)
Butadiene	106-99-0	SML = 1mg/kg in final product	WCC
Ethylene glycol	107-21-1	SML(T) = 30mg/kg	ND (<0.005mg/kg)
Acetic acid, vinyl ester	108-05-4	SML = 12mg/kg	ND (<0.03mg/kg)
Phenol	108-95-2	SML = 3mg/kg	1,2mg/kg
1,4-butanediol	110-63-4	SML = 5mg/kg	ND (<0.005mg/kg)
Diethylene glycol	111-46-6	SML(T) = 30mg/kg	ND (<0.006mg/kg)
Butyl glycol	111-76-2	TDI=0.05mg/kg b.w.	ND (<0.006mg/kg)
Isophthalic acid	121-91-5	SML(T) = 5mg/kg	0,11mg/kg
2,2 Dimethyl-1,3-propanediol	126-30-7	SML = 0.05mg/kg	0,012mg/kg
Zinc oxide	1314-13-2	SML(T) = 5mg/kg as Zinc	0,6mg/kg
Zinc hydroxide	20427-58-1	SML(T) = 5mg/kg as Zinc	0,6mg/kg
Monobutyltin tris(2-ethylhexanoate)	23850-94-4	< 10µg/kg	2,4µg/kg

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Name of Monomer/Additive	CAS N°	EU Restriction, e.g. Specific migration limit	Specific migration value
Dodecyl benzene sulphonic acid	27176-87-0	SML = 30mg/kg	ND (<6mg/kg)
Isophorone diisocyanate	4098-71-9	QM = 1mg NCO/kg	ND (<0.0004mg NCO/kg)
Formaldehyde	50-00-0	SML(T) = 15mg/kg	2,3mg/kg
Trimellitic anhydride	552-30-7	SML(T) = 5mg/kg (as trimellitic acid)	ND (<0,06mg/kg)
1,6-Hexanediol	629-11-8	SML = 0.05mg/kg	ND (<0,006mg/kg)
Sulphuric acid, Barium salt	7727-43-7	SML(T) = 1mg/kg as Ba	0,34mg/kg
Trimethylolpropane	77-99-6	SML(T) = 6mg/kg	WCC
Methacrylic acid	79-41-4	SML(T) = 6mg/kg	WCC
Benzoguanamine	91-76-9	SML = 5mg/kg	0,2mg/kg
Additive 001	Supplier confidential	SML = 0.5mg/kg	WCC
Additive 025		SML = 2mg/kg	WCC
Additive 027		SML = 0.05mg/kg	WCC
Additive 028		SML = 5mg/kg	WCC
Additive 036		SML = 0.01mg/kg as Zr	WCC
Additive A		SML = 25mg/kg	0,036mg/kg
Additive B		SML = 0.05mg/kg	ND (<0.006mg/kg)
Additive D		SML = 3mg/kg	WCC
Monomer A		SML = 0.05mg/kg	ND (<0.03mg/kg)
Monomer AB		SML(T) = 6mg/kg	ND (<0.002mg/kg)
Monomer B		SML = 0.05mg/kg	ND (<0.006mg/kg)
Monomer BB		SML = 0.05mg/kg	ND (<0.002mg/kg)

ND: Not detectable

WCC: Worst Case Calculation

This product is in compliance with the specific migration limits listed above, based on supplier statements.

iii - Additives having multiple functions

E number	Name of Additive	CAS N°
E210	Benzoic acid	65-85-0
E338	Phosphoric acid	7664-38-2
E355	Adipic acid	124-04-9
E403	Ammonium alginate	9005-34-9
E422	Glycerol	56-81-5
E464	Hydroxypropyl methyl cellulose	9004-65-3
E500	Sodium carbonate	497-19-8

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E number	Name of Additive	CAS N°
E551	Silicon dioxide	7631-86-9
E559	Kaolin (Aluminium silicate)	1332-58-7
E900	Polydimethylsiloxane	63148-62-9
E903	Carnauba wax	8015-86-9
4 confidential additives		

b) FDA

Compliance with the US Food, Drug and Cosmetic regulation of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under 21 CFR:

- 175.300 relative to “Resinous and polymeric coatings” and “Can end cements”
- 178.3910 relative to “Surface lubricants used in the manufacture of metallic articles”.

c) Other national/supranational regulation

Compliance with

- France: N°1227 “Materials in contact with foodstuffs” and latest updates,
- France: Law N°1442-2012 regarding the suspension of the importation and the placing on the market of food packaging which contains Bisphenol A
- Germany: “Food and Commodities Act “(LFGB),
- Italy: Decreto Ministeriale DM 21/03/1973 and successive updates and modifications,
- Netherlands: “Warenwetregeling verpakkingen en gebruiksartikelen”, Chapter A, IV and X,
- Spain: “Real Decreto 1125/1982 and Real Decreto 847/2011”.

Recycled material is used in manufacturing of metal raw material. All introduced recycled material is re-melted, therefore the final metal raw material is virgin material when delivered to us. Furthermore, no recycled material is introduced in our manufacturing processes.

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By observing the above regulations, we have fulfilled our duty of care regarding the compliance of the product we supply.

This document is intended for your company only and replaces previous Certificates of compliance. After a break in delivery lasting more than 12 months, this letter ceases to be valid for new deliveries of the relevant product.

This is an electronic declaration and is not signed.

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