



**Declaration of compliance for food contact legislation of beverage can ends coated with Valspar EZDEX 21b product side end liner**

I, the undersigned, **Sandip Rai**, on behalf of **Ball Corporation, European Technical Centre, Delaware Drive, Milton Keynes, MK15 8HG, UK**, acting in my position of **Regulatory Affairs Manager**, declare that **beverage can ends** produced using Epoxy food contact protection coating and characterised as hereafter:

Family of material: **Easy open ends in aluminium**

Characteristic components, from the inside outwards:

- Product side Coating: **Valspar EZDEX 21b (4000W56R21B)** epoxy based material with minimum thickness 12 g/m<sup>2</sup>
- Aluminium: **AA5182 alloy H48 or H49 temper** minimum thickness 70µm
- Public side Coating: **ANPG Vitalac 820** clear lacquer with thickness 6 g/m<sup>2</sup>
- Sealant: **Artistica RB1006 Z2** natural latex based product with 26mg per end

complies with the requirements of the following regulations

**EUROPE**

- **EU Framework Resolution ResAP (2004)1** on coatings intended to come into contact with foodstuffs
- **EU Regulation 1895/2005** on the restriction from use of certain epoxy derivatives
- **EU Regulation 1935/2004** Food contact framework Legislation
- **EU Regulation 2023/2006** on good manufacturing practice
- **EU Directive 94/62/EC (Article 11)** placing restriction on use of certain heavy metals
- **EU Regulation 2018/213** on the use of bisphenol A in varnishes and coatings intended to come into contact with food
- **CEPE: Code of Practice for coated articles where the food contact layer is a coating** – Edition 4 – February 2009

**USA**

- **USA Food and Drug Regulations 21 CFR 175.300** on resinous and polymeric coatings
- **USA Food and Drug Regulations 21 CFR 175.886** and **CFR 178.3710** on petroleum wax in contact with food
- **USA CONEG (Coalition of Northeastern Governors) Regulation** restricting the use of certain heavy metals

**MERCOSUR**

- **GMC Resolution No. 3/92** General Criteria for packaging and articles to come into contact with foodstuffs
- **GMC Resolution No. 32/07** Positive list of additives for plastic materials intended for the manufacture of food contact packages and equipment
- **GMC Resolution No. 02/12** Positive list of monomers, other starting substances and polymers authorised for the manufacture of food contact plastic packaging and equipment

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Ball Beverage Packaging Europe has defined and documented a Quality Management System that meets the requirements identified in ISO 9001, ISO14000 and OHSAS18001. In order to ensure the highest levels of hygiene, food and personal safety are maintained, individual facilities have specific programmes in place to manage these risks and adhere to both customer and legal/regulatory requirements (such as those operated by the International Standards Organisation, OHSAS and the British Retail Consortium/Institute of Packaging).

When our ends are used in accordance to our technical data sheets, the food contact coating and sealant referenced above, under normal and foreseeable conditions for use is suitable for the storage of **aqueous, acidic, alcoholic and milk and dairy products to be pasteurised up to 90°C.**

It is the customer's responsibility to ensure appropriate handling and application of the can and end. In the event of a change in the packaged product, its composition or its intended use, as well as in the event of a change in the conditions for using the material or the object, the persons for whom this declaration is intended must ensure the compatibility of the content/contents for which he/she then accepts responsibility.

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The default conditions given in Regulation EC 10/2011 as given in annex V chapter 2 paragraph 2.1.4, to demonstrate compliance with the overall migration limits, do not apply if the packaging is physically degraded by the testing conditions. Therefore, these migration tests were carried out under the worst foreseeable conditions of use.

The test conditions and simulants used were 1 hour at 90°C followed by 10 days at 40°C with 3% acetic acid to simulate long term storage of acidic products, 1 hour at 121°C followed by 10 days at 40°C with 20% Ethanol and 50% Ethanol to simulate long term storage of alcoholic products and dairy products.

Based on a surface area to volume ration of 6 dm<sup>2</sup> to 1 Kg and that one end is applied on a beverage can with a filling volume of 330ml, compliance with the specific and overall migration limits can be confirmed when the coated ends were brought into contact with simulants as shown above.

The specific migration is analysed using an analytical method in accordance with the requirements of Article 11 of Regulation EC 882/2004 and these migration tests are certified by Institute Nehring report STVJ11-088 dated 22 August 2018.

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There is no intentional use of phthalates as additives or components of the food contact coatings, end compound or external materials.

We can confirm that none of the 14 major allergens listed in Annex II of EU Regulation 1169/2011 are used in our products for any direct food contact or indirect food contact materials nor are they introduced after manufacture. Based on our knowledge of our raw materials and manufacturing process, we can state that none of the aforementioned allergens are present in the products supplied.

No dual-use additives are contained in the internal or external coatings on our ends.

Based on statements from our suppliers, we can confirm that none of the substances contained in their preparations are stated on the present candidate list of Substances of Very High Concern (SVHC) maintained in the Registration, Evaluation and Authorisation of Chemicals (REACH) system.

Furthermore, we certify that the food contact coating referenced above is composed entirely of synthetic chemical materials and does not contain any animal products or animal by-products, therefore it would be considered acceptable for the packaging of halal products and comply with the general guidelines for use of the term "halal" as defined in Codex CAC/GL 24-1997. Similarly, they are, therefore, suitable for packaging Kosher and Vegan foods.

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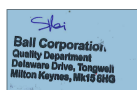
This declaration of compliance has been drawn up on the basis of declaration by our suppliers of raw materials and analysis of overall and specific migrations.

This declaration is valid for a period of five years. It will be renewed in all cases where the previous conformity is no longer ensured and in case of changes to the relevant regulations.

All products, which are manufactured during the period of validity of this statement, correspond to the information specified in this document.

Sandip Rai  
Regulatory Affairs Manager  
Ball Corporation Technical Centre Tongwell UK

Signed



11 June 2022

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