

## DECLARATION OF CONFORMITY FOR ALUMINIUM FOIL CONTAINERS AND LIDS

### GENERAL PRODUCT INFORMATION

#### A. Scope of declaration

- ✓ This declaration is valid for aluminium foil containers and lids delivered by Aluvin NV.
- ✓ Item numbers starting with: A-CH, A-CR, A-RH, A-RR, A-S, A-LA, A-WC, A-WO, A-WR.
- ✓ Item number might have suffix “PERF” or “PAST” meaning PERForation or PASTillé
- ✓ Item numbers are followed by the package quantity (e.g. A-RR0110PERF-4680)
- ✓ Neither the “PERF”, “PAST”, the thickness of the alufoil used or packaging has an influence on the specification set out in this DoC.

#### B. Composition

- ✓ The aluminium foil containers and lids are manufactured by moulding under pressure of pre-lubricated aluminium foil, suitable for contact with food. The alloys used are from the range 3 or 8: 3003, 3005, 8006, 8006 or derivatives.
- ✓ Chemical composition of aluminium foil: According to EN 573-3:2019 and in compliance with REACH (EU/1907/2006) last modified by EU/2021/57 of 25<sup>th</sup> January 2021 and does not contain substances of the candidate list table of ECHA, last (cumulated) version 23<sup>th</sup> June 2021, in effect since 8<sup>th</sup> July 2021.

### FOOD CONTACT: COMPLIANCE WITH LEGISLATION ON FOOD CONTACT

#### A. Compliance with legislation

We declare that the aluminium foil containers and lids supplied by Aluvin NV comply with:

- ✓ European Standard EN 602:2004 “Aluminium and aluminium alloys – Wrought products – Chemical composition of semi-products used for the fabrication of articles for use in contact with food”.
- ✓ European Standard EN 573-3:2019 “Aluminium and aluminium alloys – Chemical composition and form of wrought products – PART 3: Chemical composition and form of products”.
- ✓ European Standard EN 14287:2004 “Aluminium and aluminium alloys – Specific requirements on the chemical composition of products intended to be used for the manufacture of packaging and packaging components”.
- ✓ Regulation 2004/1935/EC (version 27/03/2021) on materials and articles intended to come into contact with food and 2023/2006/EC (version 17/4/2008) on Good Manufacturing Practice for materials and articles intended to come into contact with food are assured through the implemented quality assurance systems, the quality control systems, back- and forward traceability systems and the appropriate documentation control.
- ✓ Comply with the regulation EU No. 1169/2011 (consolidated version 1/1/2018) on the provision of food information to consumers and by this stating that products are free from allergens.
- ✓ Regulation 1830/2003/EC (consolidated version 26/07/2019) and by this stating that

- ✓ products are free of GMO (Genetically Modified Organisms)
- ✓ Products are of non-animal origin.
- ✓ Products are free of nanoparticles.
- ✓ Products are free of Bisphenol A and Bisphenol B.
- ✓ Products are free of substances listed on the lists I, II and III of Endocrine Disruptors List (edlists.org).
- ✓ For France: “Arrêté du 17/8/1987 relatif aux matériaux au contacts des denrées, produits et boissons alimentaire”; DGCCRF document DM/4B/COM/001, Fiche MCDA n°2b, version 1/1/2016.
- ✓ For Belgium: Royal Decree 29<sup>th</sup> April 2020, adapting Royal Decree of 11<sup>th</sup> May 1992 on FCM.
- ✓ For Belgium: Royal Decree 17<sup>th</sup> February 2021, on FCM in metal or alloys.
- ✓ For Netherlands : “Warenwetregeling verpakkingen en gebruiksartikelen”, 328583-117560-VGP (version 1 juli 2020).

Materials are purchased from reliable material suppliers and all production processes are well controlled and performed according to the standards.

## B. Conditions of use and Compliance with Migration Limits

### B.1. *Intended use of uncoated aluminium foil containers*

- ✓ Single use for all type of foods, taking into account following restrictions.
- ✓ The storage of strongly acidic, salty or alkaline products in direct contact with uncoated aluminium foil containers or lids should be avoided. In aqueous environments, these products can dissolve aluminium into the food resulting in a SRL > 5mg/kg. Special consideration should be taken when the Ph of the food is < 4.5 or > 8.
- ✓ Uncoated aluminium foil containers are not suitable as cooking utensils of aqueous solutions. Boiling or heating of aqueous solutions at 95°C or up should be limited to maximum 1 hour.
- ✓ Temperature and contact time exert significant influence on the suitability of uncoated aluminium foil containers for specific applications. The three parameters: content, temperature and time can result in a totally different specific migration of alu into the food, depending one or more of the parameters. Therefore the relevant user/ customer/ filler/ packer should ascertain the suitability of the product for its proper application.

### B.2. *Temperature range*

- ✓ The aluminium alloy can be used within a temperature range of -40°C / +350°C (max 60 minutes).
- ✓ However, the content of a filled container can influence those limits. Appropriate tests should be performed by the relevant user/ customer/ filler/ packer.

### B.3. *Proper conditions of transport and storage*

- ✓
- ✓ Long-term-storage at 12-24°C and short-term transport at 10-35°C in an atmosphere which is as dry as possible.
- ✓ Avoid moisture (wetness, condensation, etc.) and store in a closed room which is as dry as possible (max. 50% rH)
- ✓ Allow 2-3 days in intermediate storage, when moving from cold to warm or damp processing rooms.
- ✓ Give the aluminium appropriate time to acclimatise by opening boxes a few hours prior to use.
- ✓ Products should be used within 3 years of production date.

#### B.4. Migration Limits

- ✓ FCM composed of metals and alloys are not covered by specific EU-legislation. The Council of Europe (2013) guide P-SC-EMB1-215 states the recommendation that Overall Migration Limit should not exceed 60mg/kg and Specific Release Limit, based on the ALARA principle, is advised not to exceed 5 mg/kg.
- ✓ For Belgium: the Royal Decree 17<sup>th</sup> February 2021, on FCM in metal or alloys, has installed a SRL of 5 mg/kg for aluminium utensils.
- ✓ Results from measurements with actual food content will prevail over results from measurements with food simulants. Extensive tests have shown considerably lower migration results with actual food content in comparison to food simulants.
- ✓ Measurements with the following food simulants were performed:
  - Artificial Tap Water (ATW) as per DIN 10531
  - 10% Ethanol (simulant A as per EU/10/2011)
  - Vegetable Oil (simulant D/2 as per EU/10/2011)
- ✓ The Overall Migration Limit (OML) remains < 60 mg/kg for simulants ATW, A, D/2 at 2h/100°C reflux.
- ✓ The ALU Specific Release Limit (SRL) remains < 5 mg/kg for simulants ATW, A, D/2 according to the following tested conditions:
  - simulant ATW: 1hr/100°C
  - simulant ATW: 2hrs/70°C + 24h/40°C
  - simulant ATW: 10 days/40°C
  - simulant A: 2hrs/100 °C
  - simulant A: 2hrs/70 °C
  - simulant A: 4hrs/70 °C
  - simulant A: 10 days/20°C
  - simulant D/2 30 min/300°C
  - simulant D/2 1hr/180°C
  - simulant D/2 10 days/20°C
- ✓ Tests were performed with a volume/surface ratio ranging from 84mL/dm<sup>2</sup> till 189 mL/dm<sup>2</sup>, or total immersion.
- ✓ The Council of Europe (2013) guide P-SC-EMB1-215 (page 35) states that boiling tap water in an aluminium pan can result in considerable migration of ALU. Due to the reaction of water on uncoated aluminium utensils, boiling water or aqueous solutions at 100°C should be limited in duration to maximum 1 hour. Tests have shown that max. 1 hr of boiling of aqueous solutions always results in a SRL < 5 mg/kg.

#### B.5. Validity

- ✓ The results of migration tests are considered to be valid for 5 years. Aluvin NV however will conduct new migration test at least every three years and adapt the DoC if necessary.

## COMPLIANCE WITH ENVIRONMENTAL LEGISLATION

### A. Compliance with recoverability

The used aluminium material is recoverable:

- ✓ By material recycling (norm EN 13430:2013)
- ✓ In the form of energy recovery for foil with thickness below 50 µm; with an official calorific gain of 25 MJ/kg (norm EN 13431:2004, amended by 13431-2013).

### B. Heavy metals (recycling)

The aluminium used in the production of the aluminium foil containers complies with the 94/62/CE-directive on packaging waste and last amendment 2018/852/EC.

- ✓ Lead, Mercury, Cadmium and hexavalent Chromium (\*) are not voluntarily added and the total of incidental concentration of these four heavy metals does not exceed 100ppm. (\*) Hexavalent chromium does not exist in metallic aluminium.
- ✓ Substances dangerous to the environment as thus classified with symbol GHS09 in Regulation (EC) No 1272/2008 (consolidated 14/11/2020) of the European Parliament on classification, labelling and packaging of substances and mixtures (amending and repealing Directives 67/548/EEC and 1999/45/EC (consolidated 01/07/2013), and amending Regulation (EC) No 1907/2006) are not intentionally introduced in the manufacturing process of the aluminium foil, nor in the materials of the pre-suppliers.

## DETAILED ARTICLE LIST

- ✓ This DoC covers all aluminium foil containers and lids delivered by Aluvin NV starting with A-CH, A-CR, A-RH, A-RR, A-S, A-LA., A-WC, A-WR or A-WO. The non-limited list of detailed article numbers as shown below.

A-CH-range	A-CR-range	A-RH-range	A-RR-range	A-S-range	A-LA-range A-LA-SM	A-W, A-WO, A-WR range
A-CH0275	A-CR0140	A-RH0090	A-RR0072	A-S33	A-LA-SP450	A-WC0515
A-CH0470	A-CR0150	A-RH0185	A-RR0074	A-S35	A-LA-CR3500	A-WC0582
A-CH470T	A-CR0230	A-RH0210	A-RR0079	A-S35R	A-LA-SM	A-WC0600
A-CH0500	A-CR0250	A-RH0230	A-RR0080	A-S43	A-LA-SPM218	A-WC0700
A-CH0570	A-CR0255		A-RR0083	A-S45		A-WC0760
A-CH0675	A-CR0275		A-RR0085	A-S45R		A-WC0800
A-CH0700	A-CR0325		A-RR0090	A-S55		A-WC0970
A-CH0780	A-CR0350		A-RR0092	A-SGRILL		A-WC1000
A-CH0825	A-CR0387		A-RR0093	A-SM(LA)		A-WC1170
A-CH0900	A-CR0400		A-RR0100	A-SM1B		A-WC1442
A-CH0901	A-CR0420		A-RR0100L	A-SM1H		A-WC1500
A-CH1000	A-CR0450		A-RR0100R	A-SM2B		A-WC1560
A-CH1000B	A-CR0475		A-RR0101	A-SM2H		A-WC2040
A-CH1060	A-CR0490		A-RR0104	A-SM3B		A-WC2370
A-CH1125	A-CR0500		A-RR0105	A-SM3H		A-WC3320

A-CH1150	A-CR0500B		A-RR0110	A-SP125		A-WCB0780
A-CH1500	A-CR0501		A-RR0111	A-SP175		A-WCB1000
A-CH2000	A-CR0525		A-RR0115	A-SP225		A-WCB1200
A-CH2080	A-CR0540		A-RR0122	A-SP231(CH)		A-WO0251
A-CH2300	A-CR0560		A-RR0127	A-SP3300		A-WO0900
A-CH3200	A-CR0575		A-RR0132	A-SP4000		A-WO1000
	A-CR0575B		A-RR0138	A-SP450		A-WR0176
	A-CR0600		A-RR0155	A-SP450B		A-WR0251
	A-CR0610		A-RR0158	A-SP450L		A-WSP1100
	A-CR0611		A-RR0160	A-SPAT088		
	A-CR0635		A-RR0175	A-SPAT126		
	A-CR0650		A-RR0185	A-SPECL		
	A-CR0675		A-RR0186	A-SPESC		
	A-CR0690		A-RR0195	A-SSHELL		
	A-CR0700		A-RR0200	A-SPM218		
	A-CR0701		A-RR0208			
	A-CR0800		A-RR0214			
	A-CR0810		A-RR0214B			
	A-CR0825		A-RR0214H			
	A-CR0825T		A-RR0216			
	A-CR0935		A-RR0227			
	A-CR1000		A-RR0231			
	A-CR1001		A-RR0232			
	A-CR1050		A-RR0247			
	A-CR1150		A-RR0247A			
	A-CR1275		A-RR0247B			
	A-CR1475		A-RR0250			
	A-CR1501		A-RR0270			
	A-CR1580		A-RR0277			
	A-CR1600		A-RR0285			
	A-CR1650		A-RR0288			
	A-CR1650T		A-RR0294			
	A-CR1690		A-RR0304			
	A-CR2100		A-RR0330B			
	A-CR2270					
	A-CR2400					
	A-CR2600					
	A-CR2730					
	A-CR2800					
	A-CR3500					
	A-CR3500L					
	A-CR5200					

	A-CR5200D					
	A-CR8500					

**DISCLAIMER:**

This certificate covers the composition of the above mentioned materials. The food packer is responsible for ensuring that the finished food package is being used in accordance with those requirements. If not, or in case of doubt, the food packer is responsible for performing the appropriate tests necessary to ensure food safety.

We, Aluvin NV, residing Belgium, 2200 Herentals, Welvaartstraat 14, 16<sup>th</sup> August 2021, declare that the above-mentioned information is correct and has been established to our best knowledge, based on tests and information provided by our suppliers.

This Specific DoC waves the previous one and will be valid for 5 years unless and until meanwhile a later specific DoC changes this actual one.



Aluvin NV  
Hugo Bellemans  
General Manager