

Garri ehf
Hádegismóar 1
IS-110 Reykjavík

Plettenberg, 2024-03-01

Declaration of Compliance

For bare aluminium packaging
(See also item list in Annex 1)

Dear Sir or Madame,

Concerning your request, if our aluminium based articles (see Annex 1) are in compliance with the European legislation, we can give you the following answer: To our present knowledge, the legislative status and considerations about the content of substances of very high concern are not influenced by the thickness or shape of an aluminium based article, therefore only the aluminium and the contact materials (rolling oil, lubricant) are discussed.

1. Material description:

Plain aluminium ex Ohler Packaging

2. Heavy metal content used in raw materials (94/62/EC and CONEG legislation):

Our raw material suppliers have stated that the raw materials used for production of the delivered aluminium based article comply with the CONEG and Directive 94/62/EC (article 11) and its amendments 2004/12/EC and 2013/2/EC, in respect to the heavy metal content of lead, cadmium, chromium (VI) and mercury. The total concentration of lead, cadmium, chromium (VI) and mercury is below 100 ppm. Corresponding particulars are not available

3. Legislative status:

Aluminium:

The supplied aluminium based article is according to the written statements of our foil stock suppliers in conformity with standard DIN 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).

Organic compounds:

Chemical principles dedicate that organic compounds do not exist in metallic aluminium, therefore organic substances are not likely to be present in metallic aluminium (e.g. Bisphenol A, Phthalates, and Formaldehyde).

Metals and metal compounds:

The tolerated concentration levels of metals such as alloy components or impurities for certain usage of aluminium is regulated in EU-standards.

DIN 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).

The DIN EN 602:2004 refers normative to DIN EN 573-3:2019.

DIN EN 573-3:2019 (Aluminium and aluminium alloys – Chemical composition and form wrought products).

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The aluminium stock used for the production of the supplied aluminium complies according to the written statements of our suppliers with DIN EN 573-3:2019 and can be used as material which is intended to come in contact with foodstuffs, therefore the used aluminium foil stock does not contain any substances which are dangerous to the environment.

Chemical stability:

Please be advised, that plain aluminium can be dissolved by acids, bases and/or metal salts in the presence of water and/or oxygen under formation of Al (III) salts. Be advised that the appropriateness of the product can only be determined by the specialised packer or manufacturer themselves.

Dual-Use-Additives:

No Dual-Use-Additive (organic or inorganic) has to be considered for the aluminium.

Substances-of-Very-High-Concern:

Based on our present knowledge and level of understanding (chemical nature of the raw materials) it is not likely that "Substances of Very High Concern" (until now 235 substances are classified as SVHC's) are constitutionally components of the raw materials used for the production of the delivered aluminium articles.

The above mentioned statement is based on information from our raw material suppliers.

Evaluation of the production processes:

We do not intentionally introduce¹ these substances during the production processes into the delivered articles.

Evaluation of the delivered articles:

Based on the information given above, we expect that "Substances of Very High Concern" are not likely to be present in the delivered aluminium based articles. However, we would like to point out that the determination of the SVHC's is not part of our routine quality and production control system.

Registrations in accordance with the REACH Regulation No. 1907/2006/EC:

The constitutional alloy components are registered by Novelis:

231-072-3	7429-90-5	Aluminium	Full
231-096-4	7439-89-6	Iron	Full
231-105-1	7439-96-5	Manganese	Full
231-130-8	7440-21-3	Silicon	Full

1 „Intentionally introduced „shall mean „deliberately utilized in the formation of a material or component where its continued presence is desired in the final product to provide a specific characteristic, appearance or quality” The use of recycled material feedstock for the manufacture of new products, where some portion of the recycled materials may contain amounts of regulated metals, is not to be considered as “intentionally introduced” (Definition according 2002/525/EG).

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4. Resolution CM/Res (2013) 9:

The article complies with the Resolution CM/Res (2013) 9. For the evaluation of this compliance an report from an external Institute was used [Report number: (25414)10177265]. In this study two comparable articles off the same alloy and manufacture were examined. Neither the SRL-value for Aluminum (5 mg/kg) nor the maximum value for impurities was exceeded.

5 Contact material:

Rolling oil:

In addition to the food legislative status of aluminium you will receive a more detailed statement on the used auxiliary lubricant which is not in compliance with the requirements of 10/2011/EU (Annex I, Substances, Table 1, FCM substance No. 95).

The used auxiliary lubricant, which is based on hydrocarbons with small amounts of fatty acid/fatty acid ester and an antioxidant (phenol based Dual-Use-Additive) contains FDA approved components. The four components are listed in the FDA 21 CFR Regulations:

Novelis item no. 3219227: § 178.3910

Novelis item no. 3173025: § 178.3570

Novelis item no. 3219210: § 178.3620

Novelis item no. 3219614: § 172.115

To reduce the friction during the rolling process it is necessary to use this rolling oil. After all rolling process steps the aluminium foil was heated to 260-300 °C for 2-3 days (soft-annealing process). To our knowledge the rolling oil (boiling range 180-200 °C) and all components will evaporate during the thermal treatment of the aluminium foil. The following external report (Nehring Institut) will estimate the evaporation of the rolling oil components.

“According to the results of our evaluation the aluminium belts or foils, temper hard not annealed are, with regard to the composition and the migration properties of the rolling oil remaining on the aluminium surface, in compliance with §§ 30 and 31(1) of the Lebensmittel- und Futtermittelgesetzbuch (LFGB) (German Law Book on Foodstuff and Feeds) as well as Art 3 Regulation No. 1935/2004/EC. The rolling oil is also in compliance with requirements according to 21 CFR 178.3910 US FDA Regulations.

Due to the very low migration of the applied starting substances of the rolling oil for the production of the aluminium belts or foils, temper hard not annealed no adverse effect on the properties of foodstuff has to be expected which may be harmful to human health or may alter odour or flavour of foodstuff.”

Lubricant:

The used lubricant is based on vegetable oils and according to our supplier free of genetically modified organisms.

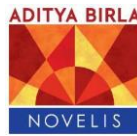
“The composition of the lubricant has been checked with regard to the positive lists of current legal requirements with regard to specific application restrictions for the known components mentioned in the Food Contact Materials Database of the EU Commission, DG Sanco, Regulation (EU) 10/2011 and 21 CFR US FDA Regulation.

The starting substances of the lubricant are all listed in Regulation (EU) No. 10/2011 with no restrictions. The product is also permitted according to 21 CFR 172.830 US FDA Regulations for direct food contact.”

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6. Traceability in accordance with regulation 1935/2004/EC, article 17:

The traceability for the delivered aluminium based article is achieved through:

- the allocation of explicit plant intern article numbers to designated materials and recording of material-specific supplier data (Batch-No., Material description, Manufacturing-No. etc.) in our plant data System
- our distinct bar code labeling of recorded designated materials.
- the posting of bar coded designated materials, clearly specified by article numbers, to customer production orders.
- the back-postings of finished materials to customer production orders enabling identification of finished products with bar code labels (Manufacturing-No, Reel-No, Designation ect.)

Advice

In order to ensure an itemized retracing of single reels we need the details stated on our bar code labels and you (the user) must guarantee that prior to further conversion each reel and the resulting products thereof are unmistakably recorded.

7. GMP-regulation 2023/2006/EC:

The GMP-Regulations requires an established and implemented quality assurance and control system. This is achieved in our factory through:

- Electronically documentation
- Production control and final inspection
- Established instructions and procedures
- ISO 9001/FSSC22000 Certification

8. Conclusions:

Based on the statements and material safety data sheets of our raw material suppliers we suggest that the delivered articles (see Annex 1) are suitable to come into contact with foodstuffs (restrictions see point: chemical stability). Be advised that the appropriateness of the product can only be determined by the specialised packer or manufacturer themselves.

Best Regards

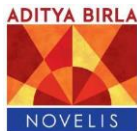
Novelis Deutschland GmbH

final review of content Dr. N. Weding - 12.12.2023

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Annex 1:

Item list / valid for:

Type	Mat. Nr.
240500	3099826

Novelis Deutschland GmbH,

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