

Customer: Thomas GmbH

Declaration of compliance

Lüdenscheid, 25.6.2021

Dear Sir or Madam,

Concerning your request, if our aluminium-based articles comply 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 lacquer systems are discussed.

**1. Material description:**

| Specification | Public side | Functional Barrier | Product side      |
|---------------|-------------|--------------------|-------------------|
| A             | 7299-80     | Aluminium          | 7111-80 + 72H7-80 |
| B             | 7759-80     |                    | 7759-80           |

**2. Intended use:**

Aerosol can: different specifications are taken into account.

**3. Heavy metal content used in raw materials:**

Our raw material suppliers have stated that the raw materials used for production of the delivered aluminium based articles comply with EC-Directive 94/62/EC (article 11) and its amendments 2004/12/EC and 2013/2/EU, 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 (0.1%). Corresponding particulars are not available.

**4. Legislative status:**

**4.1 Aluminium:**

The supplied aluminium based articles are 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).

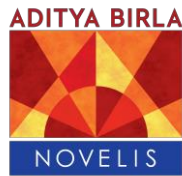
**Metals and metal compounds:**

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).



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 that is intended to come into contact with foodstuffs. Therefore, the used aluminium foil stock does not contain any substances that are dangerous to the environment.

Dual-Use-Additives:

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

Food-Allergens:

No Food-Allergen has to be considered (which is mentioned in Regulation 1169/2011/EU replacing the Commission Directive 2000/13/EC and amendment 2003/89/EC).

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 beside BPA "Substances of Very High Concern" (until now 211 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:

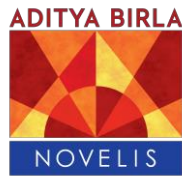
We do not intentionally introduce<sup>1</sup> these substances during the production processes into the delivered articles.

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 of 0.1%. 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.

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<sup>1</sup> „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).



Registrations in accordance with the REACH Regulation No. 1907/2006/EC:  
Novelis register the constitutional alloy components:

|           |           |           |      |                  |
|-----------|-----------|-----------|------|------------------|
| 231-072-3 | 7429-90-5 | aluminium | Full | Joint Submission |
| 231-096-4 | 7439-89-6 | iron      | Full | Joint Submission |
| 231-105-1 | 7439-96-5 | manganese | Full | Joint Submission |
| 231-130-8 | 7440-21-3 | silicon   | Full | Joint Submission |

**4.2 Evaluation of the lacquer systems (inner and outer layer):**

The following lacquer systems can be used in the production of the aerosol can closure sheet:

| Public side            | Product side                                    |
|------------------------|---|
| 7299-80 <sup>[1]</sup> | 7111-80 <sup>[1]</sup> + 72H7-80 <sup>[1]</sup> |
| 7759-80                | 7759-80 <sup>[1]</sup>                          |

<sup>[1]</sup> Contains Bisphenol A as a starting substance

The lacquer systems 72H7-80 and 7111-80 are based on PVC with a small amount of Bisphenol A.

Bisphenol A is used as starting substance in the formulation of coating system: 7111-80, 72H7-80 and 7299-80.

Based on a written statement of our raw material supplier we want to state that the lacquer systems are in compliance with:

- Regulation 1223/2009 (Cosmetic-Regulation)
- Resolution AP (2004) 1 (Annex II, Section A, C) and amendments,
- Regulation 2023/2006/EC
- Regulation 1895/2005/EC
- FDA 21 CFR Regulations: §§ 175.300

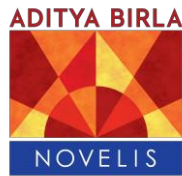
When applied as recommended the lacquered product is enabled to comply with Regulation 1935/2004/EC (article 3), Regulation 10/2011 and Regulation 1223/2009.

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

The traceability for the delivered aluminium based articles 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.

#### **6. GMP-regulations 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 Certification

#### **7. Certifications:**

- Quality management system according DIN EN ISO 9001
- Health and safety management system according DIN EN ISO 14001
- Energy management system according ISO 50001

#### **8. Conclusions:**

Based on the statements, and material safety data sheets of our raw material suppliers we suggest that the delivered articles are suitable to come into contact with foodstuffs. Be **advised** that the specialised packer or manufacturer can only determine the appropriateness of the finished packaging himself or herself.

Best Regards

Novelis Deutschland GmbH

## Alu Lacquer Codes

| Novelis Code | Original Code              | Producer            | Description | Lacquer type | Colour      | Remarks | Thomas-Code |
|--------------|----------------------------|---------------------|-------------|--------------|-------------|---------|-------------|
| 7759-80      | VP16506                    | Helios              |             | Epoxy        | transparent | Silver  | 82, 91, 98  |
| 7111-80      | L6X392L/5                  | Valspar             | Micoflex5   | Organosol    | beige       | 1.layer | 81, 82      |
| 72H7-80      | L3E692S/5                  | Valspar             | Micoflex5   | Organosol    | beige       | 2.layer | 81, 82      |
| 72F2-80      | VP16675                    | Helios              |             | Epoxy        | gold        | EP-Cups | 92          |
| 7927-80      | VP17459                    | Helios              |             | Epoxy        | weiß        | 1.layer | 93          |
| 7759-80      | VP16506                    | Helios              |             | Epoxy        | transparent | 2.layer | 93          |
| 7299-80      | SC-210-1575<br>= WL 107901 | Actega/<br>Rhenania |             | Epoxy        | gold        | Gold    | 81          |
| 77B6-80      | C-V101                     | VPL                 | Novacan     | Polyester    | transparent | Silver  | 86          |
| 7120-80      | V61S01EA                   | Valspar             | V61         | Polyester    | beige       | 1.layer | 78          |
| 77D2-80      | V61S02AA                   | Valspar             | V61         | Polyester    | transparent | 2.layer | 78          |
| 7120-80      | V61S01EA                   | Valspar             | V61         | Polyester    | beige       | 1.layer | 78 mod      |
| 77K2-80      | V61S17MA                   | Valspar             | V61         | Polyester    | gold        | 2.layer | 78 mod      |
| 77G1-80      | PL 2080-02                 | Henkel              |             | Polyester    | transparent | Silver  | 77          |

## MATERIAL DATA SHEET FOR MOUNTING CUPS

# Aluminium Micoflex-5 / Gold

**Gold lacquer outside / Micoflex-5 lacquer inside mounting cups**

### I. Metal Specification

|                        |                                  |
|------------------------|----------------------------------|
| Alloy:                 | EN AW-5754 (AlMg3) acc. EN 573-3 |
| Temper:                | H 42                             |
| Mechanical Properties: | Rp0.2 180-210 MPa                |
|                        | Rm 230-270 MPa                   |
|                        | A50 ≥ 8 %                        |
| Thickness:             | 0,41 mm + Coating = 0,42 mm      |
|                        | Tolerance: ± 0,01 mm             |

### II. Coating Specification

|               |  |
|---------------|--|
| Pretreatment: | chemically degreased<br>pretreated Alodine 6207 NR Chromium Phosphate<br>(Foodproof Quality) |
|---------------|--|

#### **Coating System: Micoflex-5 / Gold**

##### **Product Side Mounting Cup: 2-coat system, Micoflex-5 beige**

| <i>First Coating</i> |                         | <i>Second Coating</i> |                              |
|----------------------|-------------------------|-----------------------|------------------------------|
| Colour:              | beige                   | Colour:               | transparent                  |
| Type:                | Organosol               | Type:                 | Organosol                    |
| Supplier:            | Valspar                 | Supplier:             | Valspar                      |
| Code-No.:            | L6X392L/5               | Code-No.:             | L3E692S/5                    |
| Coating Weight:      | 15 ± 1 g/m <sup>2</sup> | Coating Weight:       | 4,25 ± 0,75 g/m <sup>2</sup> |
| Coating Thickness:   | 8-9 µm                  | Coating Thickness:    | 3-4 µm                       |
| Total Thickness:     | 11-13 µm                |                       |                              |

##### **Public Side Mounting Cup: 1-coat system, gold**

|                    |                             |
|--------------------|-----------------------------|
| Colour:            | gold                        |
| Type:              | Epoxy                       |
| Supplier:          | Actega Rhenania             |
| Code-No.:          | WL 107901 / SC 210-1575     |
| Coating Weight:    | 4,5 ± 0,75 g/m <sup>2</sup> |
| Coating Thickness: | 3-4 µm                      |

**All coatings are FDA approved  
Certificate upon request**