

CROWN Technology

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This document supersedes all previous versions

Food Contact Compliance of Internal Coatings on CROWN Food Europe Closures¹

This Declaration of Compliance (DoC) is issued by CROWN Technology on behalf of CROWN Packaging Europe GmbH located in Baarermatte, CH-6340 Baar, Switzerland and relates to closures manufactured by CROWN Food Europe plants listed in Appendix 1 of this Declaration

Articles: This DoC applies to the internal coatings on all metal closures currently supplied by CROWN Food Europe. Separate DoC are available covering the sealing gasket.

Applications: Aqueous, acidic, and fatty foods. NB Closures for food products intended specifically for infants and small children should use BPA-NI internal coatings.

Conditions of Use: Ambient or hot fill followed by optional heat processing at up to 130°C for up to 1 hour followed by long term ambient storage (more than 6 months). Less severe conditions also comply. Compliance is based on an internal coating surface area to jar volume ratio of up to 4.5dm²/kg(l) taking into account Article 3.2 of Regulation (EU) 2018/213.

Geographical Coverage: This DoC is applicable in the EU, USA, and territories that accept either or both EU and US regulatory compliance – please note the comments below regarding EU member state legislation on Bisphenol A.

Limitations: This DoC is applicable only for the applications, conditions of use and geographical coverage specified above. Where an intended application falls outside the scope of the above, please contact CROWN Food Europe for guidance.

Validity: This DoC will remain valid until December 2020 unless it is replaced by a later version taking account of changes in materials, processes, or changes in legislation.

All internal coatings on closures supplied by CROWN Food Europe comply with the appropriate EU and USA FDA legislation with respect to food contact materials and articles currently in force including:

- **EU Regulation (EC) No. 1935/2004** relating to materials and articles intended to come into contact with food.
- **EU Regulation (EC) No. 2023/2006** regarding Good Manufacturing Practice
- Where relevant, **EU Regulation (EC) No. 1895/2005** relating to the use of certain epoxy derivatives in materials and articles intended to come into contact with food and also the Swiss Ordinance² relating to BADGE and Derivatives. Neither BFDGE or NOGE are intentionally used in the manufacture of our products
- **EU Regulation (EU) No. 2018/213** on Bisphenol A – the articles meet the restrictions laid down in Article 2 of this Regulation
- Where relevant, **EU Directive 78/142/EEC** relating to materials and articles which contain vinyl chloride monomer and which are intended to come into contact with food.

¹ NOTE – This statement is valid for all closures produced by CROWN Food Europe but there is a separate specific statement for BPA-NI closures

² The Swiss ordinance (2005) has different migration limits (1mg/kg BADGE + BADGE.1H₂O + BADGE.1HCl + BADGE.2HCl + BADGE.H₂O(HCl)) to those in Regulation 1895/2005 (9mg/kg BADGE + BADGE.1H₂O + BADGE.2HO; 1mg/kg BADGE Chlorohydrins)

- It should be noted that the internal coatings covered by this Declaration of Compliance **are not within the scope of EU Regulation (EC) No. 10/2011** (The “Plastics Regulation”). However, the food contact coatings used for the articles specified above are within the scope of Council of Europe Resolution AP(2004)1, together with the CEPE European Coatings Code of Practice, and comply with the relevant requirements of those documents.
- All internal coatings are formulated in accordance with **US FDA 21CFR 175.300** (Resinous and polymeric coatings), and satisfy the overall migration requirements in this regulation.

However, it is important to note that with respect to Bisphenol A (BPA):

- Closure internal coatings covered by this document meet the requirements of Regulation (EU) 2018/213
- currently, packaging including closures intended for foods specifically marketed for 0-3 year olds in Denmark, Sweden, Belgium and France must comply with specific national legislation regarding Bisphenol A (BPA). In these territories, only BPA-NI³ closures should be used for these applications
- from 1st January 2015, in France, packaging including closures for **all** foodstuffs intended for human consumption must comply with specific French legislation regarding Bisphenol A (BPA), and only BPA-NI closures should be used
- a specific compliance document is available for BPA-NI coatings for closures.

Furthermore

- Internal protective coatings on closures comply with the Council of Europe Resolution AP(92)2 on Aids to Polymerisation
- Information relating to starting substances and additives with restrictions on use and dual use additives is only available under a specific Non-Disclosure Agreement (NDA)



Richard Whitaker - Manager: Food Regulatory, Crown Technologies

³ BPA-NI refers to articles where BPA (Bisphenol A) and products made using BPA are not intentionally used to formulate the food contact components

Appendix I Crown Food Europe and Associated Closure Manufacturing Sites

Aprilia - CROWN Imballaggi Italia S.r.l. Via Nettunense 118 - 04011 Aprilia (LT)

Sevilla - CROWN Closures Spain S.L. Poligono Industrial Carretera de La Isla - Turdetanos No. 1 C.P. 41703 DOS HERMANAS, Sevilla- Spain

Goleniow - CROWN Packaging Polska Sp. z o. o. ul. Maszewska 20 - 72-100 Goleniow – Poland

Seesen - CROWN Nahrungsmitteldosen Deutschland GmbH Werk Seesen Fritz-Züchner Strasse 8 - 38723 Seesen – Germany

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