

**ELMORIS**TWIST-OFF TYPE CLOSURES  
TINPLATE COATING AND PRINTING

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## DECLARATION OF CONFORMITY NO. 2017

12-04-2017

**Product** Twist-off type lug caps for glass jars

**Twist-off type lug caps are used for**

Acidic, water-based and low-fat products

Twist-off type lug caps are manufactured according to the following regulations, implemented by Elmoris JSC on 31 December, 2012: Good Manufacturing Practice No. VK12/017, which complies with the EC Good Manufacturing Practice Regulation No. 2023/2006 - Commission Regulation, published on 22 December 2006, for good manufacturing practice for materials and articles intended to come into contact with food.

The lug caps correspond to the specification requirements of the Commission Regulation (EU) No. 10/2011, published on 14 January 2011, for plastic materials and articles intended to come into contact with food and the Regulation (EC) No. 1935/2004 of the European Parliament and Council, published on 27 October 2004, for materials and articles intended to come into contact with food.

The lug caps expire 2 years after the date of manufacture. This date is indicated on the package boxes.

Storage conditions: temperature from +5 to +35 °C, relative humidity under 80%.

Technical data sheets are compiled based on batch numbers.

Head of Quality Control Department  
Tomas Kapočius



## DECLARATION OF COMPLIANCE WITH REGULATIONS ON MATERIALS AND ARTICLES INTENDED TO COME INTO CONTACT WITH FOOD<sup>1</sup>

I, the undersigned:

*Company: Elmoris, JSC*

*Address: Naujoji Riovoniu 25A, Vilnius, Lithuania*

acting in the position of the Quality Department Manager hereby declare that the material and/or article referenced by the customer (references of the specifications or other documents describing the material, type of packaged food and conditions of use of the material by the client):

*Twist-off type lug caps*

and characterized as follows – indicate the components of the material or article covered by this declaration (in the case of multi-material multi-layers, specify the nature of the different layers from the inner to the outer layer – specify whether one of the layer is a functional barrier):

*External coating: White enamel PPG 8130-001/C BPA-NI (modified Polyester) + Varnish PPG 8241-803/A BPA-NI (modified Polyester)*

*Internal coating: Size coat PPG 6650-301/A BPA-NI (polyester phenolic) + Adhesive lacquer*

*PPG 6250-401/A BPA-NI (PVC organosol) for contact with food*

*Compound ATF SA291/29mod (PVC) for contact with food*

manufactured in accordance with the following regulation:

- Regulation (EC) No 1935/2004/CE of 27<sup>th</sup> October 2004 on material and articles intended to come into contact with food;
- Regulation (EC) No 2023/2006 of 22<sup>nd</sup> December 2006 amended on good manufacturing practices for materials and articles intended to come into contact with food;
- French regulation in force concerning materials and articles intended to come in contact with food, that is to say sanction decree No 2007-766 of 10<sup>th</sup> may 2007, amended by the decree No 2008-1469 of 30<sup>th</sup> December 2008;
- Specific regulations when they exist for each part of the material or article as described previously (quote text(s) concerned):

(EC) No 10/2011

- and the following reference texts, when existing, for each part of the material or article as described previously (governmental or professional, or opinion from an official scientific body – quote text(s) concerned):

won't bring about, in accordance with Regulation (EC) No 1935/2004, under normal or foreseeable conditions of use, an unacceptable change in the composition or a deterioration in the organoleptic characteristics of the food, in the following conditions of contact (tick the appropriate boxes)<sup>2</sup>:

- Contact with all types of food products:

- Or only:

- contact with dry foods
- contact with moist foods / aqueous foods
- contact with fatty foods

<sup>1</sup> The present declaration concerns materials and articles intended to come into contact with food as defined in the field of application of Regulation (EC) No 1935/2004 and amended French decree No 2007-766 of 10<sup>th</sup> may 2007. This declaration also concerns materials in contact with feedstuff for livestock and pets, as well as teats and dummies / soothers, still covered by the decree No 92/631.

<sup>2</sup> Types of contact are described, for example, in Regulation (CE) No 10/2011, annex III.

If the material and/or article is concerned by Regulation (EC) No10/2011 and corrective factors, specify them:

*There is no corrective factor calculated*

- contact with acidic foods (up to 3% acid)
- contact with alcoholic foods (up to 15% alcohol)
- contact with frozen foods or ice cream
- other type of contact (to be specified)
- products content SO<sub>2</sub> (up to 100 ppm)

x
x

- for heat treatment:

If applicable, specify the maximum temperature and the duration of cooking in a traditional oven, in a microwave, during sterilization, etc.:

*Pasteurisation at 100°C for 60 min*

- Conditions (shelf life and temperature) of contact with the food, as specified by the customer:

*2 years at room temperature*

In addition,

- The compliance is understood to be subject to the conformity with the conditions of storage, handling and use, taking into account the specific characteristics of the material or article, and the conditions such as prescribed by professional practices or codes.
- 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 article, the person for whom this declaration is intended must ensure the compatibility packaging / content for which he/she then accepts responsibility.

This declaration of compliance has been established on the following (tick the appropriate boxes, if concerned):

- Declaration(s) by suppliers of raw materials

(Components of the material covered by the present declaration)

- Overall migration testing

If applicable, please specify the simulant(s) and testing conditions

Simulants	Time and temperature
Simulant A (10 % ethanol)	1 h at 100 °C + 10 days at 60 °C
Simulant B (3 % acetic acid)	1 h at 100 °C + 10 days at 60 °C
Simulant D2 (olive oil)	1 h at 100 °C + 10 days at 60 °C

Testing of substances subject to restriction or, for paper and board, substances with purity criteria (see good manufacturing practices)

If applicable, please specify the substance(s) subject to restriction and the authorized limit(s)

Names	Identification CAS - EINECS - PM	Limits
Polyadipate	Ref.-No 76866	30 mg/kg
1,1,1-Trimethylolpropane	0000077-99-6	SML = 6 mg/kg
2,6-di-tert-Butyl-p-cresol (BHT)	0000128-37-0	SML = 3 mg/kg
Acrylonitrile	0000107-13-1	SML = n. n. (0.01mg/kg)
Acrylic acid	0000079-10-7	SML(T) = 6 mg/kg
Butyl glycol	0000111-76-2	TDI = 0.05 mg/kg
Butyl methacrylate	0000097-88-1	SML(T) = 6 mg/kg

Names	Identification CAS - EINECS - PM	Limits
Ethyl methacrylate	0000097-63-2	SML(T) = 6 mg/kg
Formaldehyde	0000050-00-0	SML(T) = 15 mg/kg
Isophthalic acid	0000121-91-5	SML(T) = 5 mg/kg
Methyl methacrylate	0000080-62-6	SML(T) = 6 mg/kg
2,2-Dimethyl-1,3-propanediol (Neopentyl glycol, NPG)	0000126-30-7	SML = 0.05 mg/kg
Peroxides	proprietary	SML = 0.05 mg/kg
Terephthalic acid	0000100-21-0	SML(T) = 7.5 mg/kg
Tetrafluoroethylene	0000116-14-3	SML = 0.05 mg/kg
Vinyl chloride	0000075-01-4	QM = 1 mg/kg
Tin-catalyst	proprietary	SML = 0.05 mg/kg SML = 0.006 mg/kg

Specify how the compliance with these limits has been established:

- If by analysis, specify simulant and testing conditions: *1 h at 100 °C + 10 days at 60 °C.*
- If by other means (calculation, modelling), specify:

Presence of dual-use additives, as specified by the user (food additive E... or flavouring substance FL...)<sup>3</sup>

Names	Identification CAS - EINECS - PM or number E or FL	Limits
Titanium Dioxide	0013463-67-7 E171	SML = 60 mg/kg
Sodium Bicarbonate	144-55-8 E500	-

- Regulation (EC) No 10/2011 concerning the ratio surface / volume in contact with food, specify this ratio:

x

Results:

By SQTS Report 2015L47574 overall migration (on 82 mm twist-off type lug caps):

- Simulant A – 2.0 mg/lug cap; 0.4 mg/dm<sup>2</sup>;
- Simulant B – 4.0 mg/lug cap; 0.8 mg/dm<sup>2</sup>;
- Simulant D2 – 30.0 mg/lug cap; 6.0 mg/dm<sup>2</sup>;

Lug cap diameter	Surface in contact with food (cm <sup>2</sup> /dm <sup>2</sup> )	Lug cap diameter	Surface in contact with food (cm <sup>2</sup> /dm <sup>2</sup> )
Ø43	10 cm <sup>2</sup> / 0.10 dm <sup>2</sup>	Ø66	27 cm <sup>2</sup> / 0.27 dm <sup>2</sup>
Ø48	13 cm <sup>2</sup> / 0.13 dm <sup>2</sup>	Ø70	30 cm <sup>2</sup> / 0.30 dm <sup>2</sup>
Ø53	15 cm <sup>2</sup> / 0.15 dm <sup>2</sup>	Ø82	42 cm <sup>2</sup> / 0.42 dm <sup>2</sup>
Ø58	19 cm <sup>2</sup> / 0.19 dm <sup>2</sup>	Ø89	52 cm <sup>2</sup> / 0.52 dm <sup>2</sup>
Ø63	24 cm <sup>2</sup> / 0.24 dm <sup>2</sup>	Ø100	65 cm <sup>2</sup> / 0.65 dm <sup>2</sup>

<sup>3</sup> Regulation (EC) No 1333/2008 on food additives and Regulation (EC) No 1334/2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods

- Regulation (EC) No 10/2011, concerning non-intentionally added substances (NIAS) and non-listed substances.

Names	Identification (CAS, EINECS, etc.)
Dibutyl sebacate	109-43-3
DINCH	166412-78-8

This declaration of compliance is valid as long as the material composition has not changed, its destination has not changed and in absence of regulatory changes.

This declaration is established in accordance with article 16 of Regulation (EC) No 1935/2004 for materials subject to specific European measures and the amended French decree No 2007-766 for other materials.

This declaration is intended for:

Head of Quality Control Department  
Tomas Kapočius

27-02-2017

