



Ball Beverage Packaging Europe Limited

Declaration of Compliance for PPG 2489-814G Lacquer

Intended use:

Internal lacquer, for aluminium beer and beverage easy open ends, intended for single use only.

Suitable for use:

- Aqueous beverages
- Acidic beverages being pasteurized (up to 60 min. at 100 °C)
- Milk / dairy products being pasteurized or sterilized (up to 60 min. at max. 130 °C)
- Alcoholic beverages up to 50% vol

We declare that the above referenced product, when applied and cured according to good manufacturing practice, and intended end-use conditions, is suitable for the intended application. Compliance assessments are based on information provided by supplier.

EU: Regulation (EC) No. 1935/2004 – Article 3

EU: Commission Regulation (EC) No. 2023/2006

EU: CEPE Good Manufacturing Practice

EU: CEPE Code of Practice, Framework Resolution ResAP(2004)1, Resolution ResAP(92)2

NL: Verpakkingen en Gebruiksartikelenbesluit

French: LOI n°2012-1442

Spain: Spain Royal Decree 847/2011

EU: Regulation (EU) No 10/2011 of 14 January 2011 "on plastic materials and articles intended to come into contact with food", as amended, is formally not applicable to internal coatings for metal food packaging. However, with regard to the used monomers and other starting substances as well as to the migration the product PPG2489-814G meets the requirements of this regulation. Some initiators, aids to polymerization and pigments as well as some solvents are not specifically regulated by Regulation (EU) No 10/2011.

Non Intentionally Added Substances ("NIAS") - According to the supplier's statement, the NIAS assessment was performed following the protocol outlined in the TSC33 "NIAS Guidelines for coated rigid Metal Packaging intended for direct Food Contact"

EU: Commission Regulation (EU) 2024/3190

Supplier confirmed that Bisphenol A (BPA), other (hazardous) bisphenols or (hazardous) bisphenol derivatives have neither been intentionally nor knowingly used for the manufacture of the product PPG2489-814G, accordingly, the aforementioned product complies with any applicable requirements of Regulation (EU) 2024/3190.



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Per- and Polyfluoroalkyl Substances (PFAS)

Regulation (EU) 2025/40 - Packaging and Packaging Waste Regulation (PPWR) – Based upon information provided by supplier, the product PPG2489-814G constitutionally contains no PFAS, particularly also no Polytetrafluoroethylene (PTFE) and/or Perfluorooctanoic acid (PFOA) or other substances that might be considered PFAS. Supplier confirms that metal food packaging manufactured using coating PPG2489-814G will comply with all limits established in Chapter II Article 5 "Requirements for substances in packaging" 5. (a), (b), (c).

EU/USA: Regulation (EU) 2025/40, U.S. Model Toxics in Packaging Legislation (formerly CONEG)

According to supplier information, that in the manufacture of PPG2489-814G no deliberate or knowing addition of toxic metals or heavy metals, specifically lead, cadmium, mercury and chrome (VI), is made, and that none of the suppliers of the raw materials purchased for the production of the above-mentioned product have indicated that they contain these toxic metals or heavy metals as by-products or significant impurities, the sum of the concentrations of the aforementioned elements resulting from substances present in PPG2489-814G is in summary less than 100 ppm by weight. The product thus complies with the limits established in Chapter II Article 5 "Requirements for substances in packaging" of Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste (PPWR), amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, as amended, as well as the U.S. Model Toxics in Packaging Legislation (formerly CONEG), developed by the Toxics in Packaging Clearinghouse (TPCH).

Additional EU Substance-Specific Statements

Food Additives (Dual Use Additives), Flavourings

Supplier confirms that in the manufacture of the product PPG2489-814G the following Food Additives (Dual Use Additives), Flavourings are used: Adipic acid (E 355), Carnauba (E 903), Hydrocarbon waxes, paraffin and microcrystalline (E 905), Phosphoric acid (E 338).

Bisphenol F (BPF), other Bisphenols

Supplier stated that PPG2489-814G contains a phenolic resin, and that it cannot be completely ruled out that Bisphenol F (BPF) will be formed in trace amounts during the manufacture of a phenolic polymer. Based on information provided no direct addition of BPF or other bisphenols as intentional ingredients or reactants are made during the manufacture of the product PPG2489-814G and the constituent raw materials. Any potential presence of bisphenols contained in the product are present as chemical by-products (non-intentionally added substances - NIAS). As a part of supplier assessment, migration examinations was carried out and resulted in non-detectable residuals of Bisphenol F and other bisphenols (examinations carried out with PPG2489-814E).



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Glycol ethers, Glycol ether acetates

The dry film constituents of the product PPG2489-814G do not contain glycol ethers and/or glycol ether acetates, classified toxic for reproduction, category 1A, 1B, as defined in Regulation (EC) No 1272/2008. The presence of technically unavoidable impurities or residuals cannot be completely ruled out.

Mineral Oil Components (MOSH, MOAH, POSH, PAO)

Supplier states based on knowledge of the composition of the product PPG2489-814G and its manufacturing processes, and upon information provided to PPG by our raw material suppliers, that the dry film constituents of the aforementioned product do not contain significant residual amounts of volatile mineral oil components, such as MOSH (Mineral Oil Saturated Hydrocarbons), MOAH (Mineral Oil Aromatic Hydrocarbons), POSH (Polyolefinic Oligomeric Saturated Hydrocarbons) and/or PAO (Poly Alpha Olefins). Migration examinations of the product mentioned above revealed very low quantities of some mineral oil components which however cannot endanger human health. Nonetheless, we hereby also confirm, that PPG2489-814G contains the following non-volatile substances, which have to be considered as mineral oil (saturated) hydrocarbons: Hydrocarbon waxes, paraffin and microcrystalline (CAS no. 8002-74-2, FCM no. 94), as well as Polyolefin Oligomeric Saturated Hydrocarbons (POSH): Polyethylene wax (Ethene, homopolymer, CAS no. 9002-88-4, FCM no. 549).

Synthetic Polymer Microparticles (SPM, Microplastics)

According to the adopted Commission Regulation (EU) 2023/2055 of 25th September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 (REACH) as regards Synthetic Polymer Microparticles (SPMs), SPMs are considered among others solid polymers with all dimensions equal to or less than 5 mm.

Supplier confirms that the product PPG2489-814G contains a polyethylene wax, which fulfils the aforementioned criteria and is therefore to be regarded as synthetic polymer microparticles. Hence, the liquid coating of PPG2489-814G also falls indirectly within the scope of Commission Regulation (EU) 2023/2055. Paragraph 1 of the Annex of Commission Regulation (EU) 2023/2055 does however not apply to the final cured coating or dry film of PPG2489-814G because the requirements of Paragraph 5 (a), (c) of the same Annex are met ("solid matrix" clause).



Ball Beverage Packaging Europe Limited
USA

US FDA 21 CFR §§ 174.5, 175.300

The non-volatile components of the product PPG2489-814G meet the requirements of the FDA Regulation 21 CFR § 174.5 "General provisions applicable to indirect food additives". The non-volatile components also meet the requirements of § 175.300 "Resinous and polymeric coatings"

Japan: Food Sanitation Act

Product PPG2489-814G complies with the relevant requirements of Food Sanitation Act and the Food Safety Basic Law.

General Statement

Responsibility for compliance with Regulation (EC) No 1935/2004 lies with the person who places the finished packaging on the market.

Responsibility for compliance with Regulation (EC) No 2025/40 lies with the person who places the finished packaging on the market.

Signed on behalf of Ball Beverage Packaging Europe Limited:

Ivana Jovin
Regulatory Specialist

15th July 2026