



Ball Beverage Packaging Europe Limited

Declaration of Compliance for external coating PPG5018-802A Clear Varnish

Intended use: External varnish, aluminium beer and beverage easy open ends, intended for single use only. Under circumstances of the destined and expected use suitable for incidental and short-term direct food contact. Not designated for long-term direct food contact.

Assessment

No harmonized EU regulations exist for exterior non-food contact coatings. The finished packaging, however, must comply with the general requirements of Art. 3 of Regulation (EC) No 1935/2004 which specify that food contact materials and articles in their finished state, under normal and foreseeable conditions of use, do not transfer their constituents to food in quantities that would endanger human health or bring about an unacceptable change in the composition of the food or a deterioration in its organoleptic characteristics.

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.

European Legislation

- **Regulation (EC) No. 1935/2004 (Framework Regulation)**
- **Regulation (EC) No. 2023/2006 (Good Manufacturing Practices)**
- **EU: CEPE Code of Practice, Framework Resolution ResAP(2004)1, Resolution ResAP(92)2**
- **The Netherlands: Verpakkingen en Gebruiksartikelenbesluit**
- **Per- and Polyfluoroalkyl Substances (PFAS) - Regulation (EU) 2025/40 - Packaging and Packaging Waste Regulation (PPWR)**

Based on information from supplier the coating PPG5018-802A comply with Chapter II, Article 5 – Requirements for substances in packaging of Regulation (EU) 2025/40.

No intentional use of per- and polyfluoroalkyl substances (PFAS) has been made. The applicable PFAS limits under Article 5 are therefore met.

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

Based on information from supplier no deliberate addition of lead, cadmium, mercury or hexavalent chromium is made. In addition, 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 PPG5018-802A 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.



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Model Toxics in Packaging Legislation (formerly CONEG), developed by the Toxics in Packaging Clearinghouse (TPCH).

- Commission Regulation (EU) 2024/3190 – Bisphenol A (BPA) and Other Bisphenols

Based on supplier information Bisphenol A (BPA), other regulated bisphenols or regulated bisphenol derivatives are neither intentionally nor knowingly used in the manufacture of the coating PPG5018-802A, product complies with requirements of Regulation (EU) 2024/3190.

Additional EU Substance-Specific Statements

Food Additives (Dual Use Additives), Flavourings

Supplier states that in the manufacture of the product PPG5018-802A the following Food Additives (Dual Use Additives), Flavourings are used: Adipic acid (E 355, FL 08.026), Carnauba (E 903), Hydrocarbon waxes, paraffin and microcrystalline (E 905), Phosphoric acid (E 338).

Glycol ethers, Glycol ether acetates

The dry film constituents of the product PPG5018-802A 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 Hydrocarbons (MOH): MOSH, MOAH

Polyolefin Oligomeric Hydrocarbons (POH): POMH, POSH, PAO

Supplier states based on knowledge of the composition of the product PPG5018-802A and its manufacturing processes, and upon information provided to PPG by raw material suppliers, that the dry film constituents of the aforementioned product do not contain significant residual amounts of volatile MOH (Mineral Oil Hydrocarbons), such as MOSH (Mineral Oil Saturated Hydrocarbons) and/or MOAH (Mineral Oil Aromatic Hydrocarbons). The above mentioned product has been formulated exclusively for application to the external and non-food contact surface of (light) metal or plastic packaging. Results of migration examinations are hence not available. Supplier confirms that the dry film will not contain residual amounts of MOAH exceeding a total level of 0.1 %. Nonetheless, PPG5018-802A contains the following non-volatile substances, which have to be considered as Mineral Oil Saturated Hydrocarbons (MOSH): Hydrocarbon Waxes, Paraffin and Microcrystalline (CAS no. 8002-74-2), Waxes, refined, derived from petroleum based or synthetic hydrocarbon feedstocks, high viscosity (FCM no. 94), as well as Polyolefinic Oligomeric Saturated Hydrocarbons (POSH): Polyethylene Wax (Ethene, homopolymer, CAS no. 9002-88-4, FCM no. 549).



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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 PPG5018-802A contains a polyethylene wax, which fulfils the aforementioned criteria and is therefore to be regarded as synthetic polymer microparticles. Hence, the liquid coating of PPG5018-802A 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 PPG5018-802A because the requirements of Paragraph 5 (a), (c) of the same Annex are met ("solid matrix" clause).

USA

US FDA 21 CFR §§ 174.5, 175.300

The non-volatile components of the product PPG5018-802A meet the requirements of the FDA Regulation 21 CFR § 174.5 "General provisions applicable to indirect food additives". They also meet the requirements of § 175.300 "Resinous and polymeric coatings". However, PPG5018-802A is an external coating and not intended to come into contact with food. Components, which do not migrate into food, are not considered food additives by FDA and are therefore not regulated under 21 CFR § 175.300.

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