



Ball Beverage Packaging Europe Limited

Declaration of Compliance for Metlac 815721 external varnish

Intended use:

Varnish for the external application of 2-piece aluminum beverage cans and the protection of the non-food contact surface.

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.

EUROPE

EU: Regulation (EC) No. 1935/2004 - Supplier states compliance, based on their experience and assessment, with the requirements set out in Article 3 of Regulation (EC) No. 1935/2004 of the European Parliament and the Council of 27 October 2004 on materials and articles coming into contact with food.

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

EU: Commission Regulation (EU) 2024/3190

Supplier indicates that Bisphenol A (BPA) and other Bisphenols and their derivatives are not added or knowingly present in any raw material, product 815721 is therefore in compliance with Reg. 2024/3190.

EU: Regulation No 2025/40 on packaging and packaging waste, Ref Art 5. Requirements for substances in packaging.

Supplier indicates that product 815721 is in full compliance with Article. 5 of Reg. 2025/40. PFAS are not intentionally added to 815721 product, and according to supplier information in manufacture of 815721 no deliberate or knowing addition of toxic metals or heavy metals, specifically lead, cadmium, mercury and chrome (VI), is made and therefore the product does not constitutionally contain any heavy metals. Furthermore, none of the raw materials purchased for the production of the above-named product is specified by its supplier to contain any toxic metals or heavy metals as by-products or significant impurities. The total content of all elements combined is in summary less than 100 ppm by weight and thus complies with the



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limit specified by the European Council and Parliament Directive on Packaging and Packaging Waste 94/62/EC (December 1994), as amended, as well as the US CONEG (Coalition of Northeastern Governors) "Toxics in Packaging" Model Legislation, rev.2008, and art. 5 of Reg. 2025/40.

EU: Regulation 1895/2005, BADGE-NOGE-BFDGE

Bisphenol A DiGlycidyl Ether (BADGE), Epoxy novolac resin (NOGE) and other materials containing BFDGE are not intentionally added, and based on supplier best knowledge they are not present in any raw material. The product can be regarded as being BADGE, BFDGE and NOGE free. For this reason, product 815721 does not fall in the scope of Reg. 1895/2005.

EU Regulation 1907/2006 REACH and Regulation

Supplier confirms that product 815721 complies with the applicable restriction of Regulation (EC) No 1907/2006, as all the substances used for its manufacture are:

- Excluded from the Regulation, and/or
- Exempted from registration and/or
- Have been pre-registered and/or registered

The following substances have been intentionally used for the production of some raw materials present in product 815721 and are listed in the ECHA Candidate List of Substances of Very High Concern for Authorisation, in the current version as published on ECHA website:

- Benzene-1,2,4-tricarboxylic acid 1,2-anhydride (CAS 552-30-7) < 0.1%
- Melamine (CAS 108-78-1) < 0.1%

The following substances have been intentionally used for the production of some raw materials present in product 815721 and are subject to harmonized classification under Regulation (EC) No 1272/2008 (CLP) as carcinogenic, mutagenic or toxic for reproduction (CMR) category 1A, 1B or 2, in accordance with the provisions of Regulation (EC) No 1907/2006 (REACH).

- Formaldehyde (CAS 50-00-0) < 0.1%

Regulation (EC) 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 the product Metlac 815721 and in general to lacquers for metal food packaging. However, with regard to the used monomers and other starting substances, the product Metlac 815721 meets the requirements of this regulation.

ITA: Decreto Ministeriale 21/3/1973

Supplier indicates based on their experience and assessment that product 815721 does not transfer to the internal side of the packaging in direct contact with food a quantity of substances exceeding any limits established by Italian Ministerial Decree of 21 March 1973 (Ordinary Supplement to OJ No 104 of 20/4/1973) - Sanitary regulation of packaging, containers, and equipment intended to come into contact with foodstuffs.



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Switzerland: Swiss Ordinance SR 817.023.21

Based on supplier information product 815721 does not release to the food a quantity of substances exceeding any limits established by this regulation.

German LFGB

Supplier states based on their experience and assessment that product 815721 complies with the requirements of German LFGB § 30 e § 31.

Additional EU Substance-Specific Statements

Food Additives (Dual Use Additives), Flavorings

Product 815721 contains dual-use additives. Supplier states, based on their knowledge that these substances, due to their low concentration in the product, do not migrate into quantities that could have technological effects on food.

- E321 2,6-di-tert-butyl-p-cresol CAS 128-37-0
- E355 Adipic acid CAS 124-04-9

EU Regulation No 1829/2003 and No 1830/2003, Genetically modified organisms

Based on supplier statement the raw materials intentionally used in the formulation of 815721 are sourced from non-GMO materials. No processing aids, enzymes, or additives derived from GMOs have been used in the manufacturing process. The product is therefore compliant with the European Union Regulation (EC) No 1829/2003 on genetically modified food and feed, and feed and Regulation (EC) No 1830/2003 concerning the traceability and labelling of GMOs.

Glycol ethers, Glycol ether acetates

The dry film constituents of the product 815721 does 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.

France Arrêté 28/09/2023, Endocrine disruptors

None of the substances included in the french Arrêté du 28 septembre 2023, JORF n°0228, 30 Septembre 2023, fixant la liste des substances présentant des perturbation endocrinienne, is intentionally used in product 815721.

Annex II of the Regulation (EU) No 1169/2011

Based on supplier information food defined such as “major food allergen” or listed as “food allergen” in the followings:

Annex II of the Regulation (EU) No 1169/2011

FDA and reported in Food Allergy Safety, Treatment, Education, and Research (FASTER) Act of April 23, 2021



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Are not intentionally used during the manufacturing process of the product, and according to current knowledge, they are not present into any raw materials.

Mineral Oil Hydrocarbons (MOH): MOSH, MOAH

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

Some of the components of the solvent fraction used in 815721 falls in the definition of Mineral Oil Aromatic Hydrocarbons (MOAH) and Mineral Oil Saturated Hydrocarbons (MOSH). Supplier states to the best of their knowledge that, the dry film constituents of the product 815721 does 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 dry film of the lacquer 815721 complies with regard to the limits defined by Décret n°2022-748 of 13 April 2022:

- Mineral oil Aromatic Hydrocarbon MOAH C1-C7: < 0.1% OR C3-C7: < 1 ppm
- Mineral oil Saturated Hydrocarbon MOSH C16-C35: < 0.1%

USA

US FDA 21 CFR §§ 174.5, 175.300

All substances intentionally used in the formulation of 815721 are listed in, or comply with the requirements of, the US FDA 21 CFR §§ 174 and 175.300 regulations for indirect food additives and food-contact substances.

California Proposition 65 compliance

Supplier states that substances listed in the California's Proposition 65 are not directly used in the manufacturing process, but the following substances are present in some raw materials at level of impurities:

- Formaldehyde (CAS 50-00-0)
- Methanol (CAS 67-56-1)

Above impurities do not migrate from dry film in concentrations higher to levels called "Safe Harbor" and established from California Safe Drinking and Toxic Enforcement Act of 1986 (Proposition 65 issued on January 3, 2025).

General Statement

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



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Signed on behalf of Ball Beverage Packaging Europe Limited:

Ivana Jovin
Regulatory Specialist

15th July 2026