



Ball Beverage Packaging Europe Limited

Declaration of Compliance for Sherwin Williams valPure (TM) V7038 series (V70Q38AAHV/V70Q38AA) Internal lacquer

Sherwin Williams valPure (TM) V7038 (V70Q38AAHV/V70Q38AA) internal Lacquer for aluminium beverage can.

Intended use:

- Aqueous foods
- Alcoholic foods
- Acidic foods
- Fatty foods

Suitable for coating light metal packaging which is in direct contact with the above food types at processing temperatures up to and including 130°C retort conditions for 30 minutes followed by a storage period longer than 24 hours at room temperature and any contact condition that can be considered as less severe.

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 available analytical data and applicable legislation.

The user remains responsible for verifying suitability and compliance of the final article under actual conditions of use.

Legal compliance

Europe

Council of Europe Resolution AP(2004)1 on coatings intended to come into contact with foodstuffs.

Council of Europe Resolution AP(92)2 on aids to polymerisation for plastic materials and articles intended to come into contact with foodstuffs

EU: CEPE Code of Practice, for coated articles where the food contact layer is a coating.

EU: Regulation (EC) No. 1935/2004

When applied in accordance with the recommendation on the technical datasheet and good manufacturing practice, the product enables the finished article to comply with Article 3 - General requirements of Regulation (EC) No 1935/2004.

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

German LFGB §§ 30 and 31(1)



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French Law No 2012-1442 for the Suspension of the Manufacture, Import, Export and Marketing of All-Purpose Food Packaging Containing Bisphenol A

Dutch Warenwet chapter X (HOOFDSTUK X – DEKLAGEN)

Spanish Real Decreto 847/2011

EU: Commission Regulation (EU) 2024/3190

Supplier states that Bisphenol A, B, F or S and other hazardous bisphenols or hazardous bisphenol derivatives are not intentionally used in the above-mentioned coating and therefore the product complies with Regulation EU 2024/3190.

Regulation (EU) 2025/40 - Packaging and Packaging Waste Regulation (PPWR)

Supplier indicates that coating do not contain PFAS chemicals as intentionally added ingredients, and therefore, the products meets the requirements for metal packaging of Regulation (EU) 2025/40 on Packaging and Packaging Waste Article 5.

Based on information provided by supplier compounds of lead, cadmium, mercury, or hexavalent chromium are not intentionally added. Furthermore, supplier states that based on information from raw material suppliers, that sum of the concentrations of lead, cadmium, mercury, and hexavalent chromium is below 100 ppm. and indicates that the coating will enable the final packaging to meet the requirements of (EU) 2025/40 Article 5. (former EU Directive 94/62/EC will be repealed on 12. August 2026) on Packaging and Packaging Waste and the US CONEG regulations.

EU 1907/2006 (REACH) – Product is in compliance with Regulation (EC) 1907/2006 (REACH) as all substances they are composed of are:

- Excluded from the Regulation, and/or
- Exempted from registration and/or
- Registered by suppliers or by Sherwin Williams

Overall migration

Test results confirm compliance with the overall migration requirements of Resolution AP(2004)1 and the CEPE coatings Code of Practice, overall migration limit 10 mg/dm².

Specific migration

Test results confirm compliance with the specific migration limits, assuming a surface/volume ratio of 6 dm²/kg, and quantity restrictions specified for certain monomers and additives listed in Resolution AP(2004)1 and the CEPE coatings Code of Practice.

Sensory Test

The sensory evaluation results give no reason for doubts concerning the transfer of odor or flavor to foodstuffs through direct contact, altering their taste.



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Additional EU Substance-Specific Statements

Supplier confirms that products do not knowingly contain natural rubber latex, rosin (colophony), nickel compounds, food allergens defined in **Annex II of Regulation (EU) No 1169/2011**.

The product is not manufactured using Bisphenol A, F, S, BADGE, NOGE or BFDGE nor with any materials made from Bisphenol A, F, S BADGE, NOGE or BFDGE. BPA is not intentionally added to the product.

Supplier states that TMBPFDGE, a bisphenol derivative, is used as a monomer. TMBPF, a non-endocrine active material, is used as a precursor in the manufacture of the product and is not expected to be present in above de minimis levels in the final coating.

USA

US FDA 21 175.300

Product complies Food and Drug Regulations 21 CFR 175.300 on resinous and polymeric coatings. Must not be used for infant formula.

California Proposition 65

Supplier states that product, as supplied do not contain Proposition 65 Chemicals.

Canada

The film forming components of product comply with the applicable requirements of the Food Directorate of Health Canada under Division 23 of the Canada Food and Drug Regulations, Sections B.23.001 – B.23.008. The coating is not intended for packaging infant formula.

Japan

The film forming components of product are listed in the Japan Food Sanitation Act positive list.

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 (EU) 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

20th July 2026