

Frais Flaschenverschlüsse GmbH

Date: 23.05.2026

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Attn: Mrs. Gabriele Binder

Pry-off Crown Caps with Liner 02

Declaration of Compliance (DoC)

Dear Sir/Madame,

Based on our testing, verification and information gathered from our suppliers, we confirm our product conformity as below.

1. Framework Regulation (EC) 1935/2004

The product, as delivered, complies with the provisions of the Framework Regulation (EC) 1935/2004 on food contact materials, pertaining traceability, according to Article 17.

2. GMP Regulation (EC) No: 2023/2006

The product is manufactured under good manufacturing practices, pertaining

- Article 5 (Quality Assurance System),
- Article 6 (Quality Control System),
- Article 7 (documentation)

of Regulation (EC) No: 2023/2006 on food contact materials.

3. Plastics Recycling Regulation (EC) 282/2008

The formulation does not contain used recycled plastic materials as described in Regulation (EC) 282/2008, as described in article 2, (2) b). The formulation may contain rework.

4. Epoxy Regulation (EC) 1895/2005

The formulation of our product does not contain epoxy resins. The presence of reaction products as mentioned in the Regulation is therefore not to be expected.

5. Active Packaging Regulation (EC) 450/2009

The product does not contain ingredients, which could be regarded as an active packaging material.

6. Plastics Regulation (EU) 10/2011

6.1 Union List — Annex I and II

The formulation complies with the compositional requirements as set forth in annex I and II of Regulation (EU) 10/2011, including amendments (EU) 321/2011, (EU) 1282/2011, (EU) 1183/2012, (EU) 202/2014, (EU) 174/2015, (EU) 2016/1416, (EU) 2017/752, (EU) 2018/79 and (EU) 2018/213, (EU) 2018/831, (EU) 2019/37, (EU) 2019/1338, (EU) 2020/1245, (EU) 2023/1442, (EU) 2023/1627 and (EU) 2024/3190.

Further to the requirement of adhering to the limit of overall migration, the product contains the following components with specific restrictions to be observed.

Annex I

FCM	PM Ref	Designation	CAS No.	Restriction	Remarks
141	13380	1, 1, 1-Trimenthylolpropane	77-99-6	SML=6 mg/kg	<1%
223	13630	Butadiene	106-99-0	SML=ND	(*)
294	93120	Triodipropionic acid, didodecyl ester	123-28-4	SML(T)=5mg/kg	
384	40000	2,4-Bis-(octylmercapto)-6-(4-hydroxy-3,5-di-tert-butylanilino)-1,3,5-triazine	991-84-4	SML=30 mg/kg	
433	68320	Octadecyl3-(3,5_Di-tert-butyl-4-hydroxyphenyl) propionate	2082-79-3	SML=6 mg/kg	

(*) Qm = 1 gm/kg in finished product

Annex II

FCM	PM Ref	Designation	CAS No.	Restriction	Remarks
--	--	Aluminum, compounds	--	SML=1 mg/kg	As Al
--	--	Lithium, compounds	--	SML=0,6 mg/kg	As Li
--	--	Iron, compounds	--	SML=48 mg/kg	As Fe
--	--	Zinc, compounds	--	SML=5 mg/kg	As Zn

Polymer Production Aids

FCM	PM Ref	Designation	CAS No.	Restriction	Remarks
246	25150	Tetrahydrofuran	109-99-9	SML=0,6 mg/kg	Solvent
--	--	Peroxide	--	SML=0,05 mg/kg (as O)	Res. AP (92) 2

There are components, about which the suppliers state the presence of substances with SML /Q^m the identity of which is their confidential know how. If desired, we could arrange a non-disclosure agreement between the supplier and an independent laboratory for evaluation.

6.2. Article 11 (3) — Substances with a restriction in food and flavorings

According to article 11(3) of Regulation (EU) 10/2011, the following direct food additives are present in the formulation and/or are present in raw materials used:

FCM	PM Ref	Designation	CAS No.	E-No.	Max. %
106	89040	Sodium, potassium and calcium salts of fatty acids	-	E 470 a	1%
193	24610	Vinyl Benzene	100-42-5	FL 01.015	
504	86240	Silicon dioxide	7631-86-9	E 551	1%

6.3. Article 19 — Substances not listed in the Union List — NIAS

According to Article 6, 4 (a), in (EU) 10/2011, the product, and any contact material manufactured with it may contain substances not intentionally added.

An examination of the migrate (50% ethanol, 10 days at 60°C) by means of GC-QTOF-MS/FID screening did not show any substances, the presence of which would compromise compliance with Article 19. The test was based on the assumption of an area of 1,9 dm² in contact with 200 ml beverage.

6.4. Types of food, contact time and temperature, S/V Ratio

Closures that are manufactured using this liner material are suitable for all types of foods, the compliance of which has to be assessed using simulants A, B, C or D1 according to annex III. It is recommended to check the level of migration. The product is primarily not intended to be used in contact with fatty or oily food, although in special cases suitability may be demonstrated. The product is intended for

- Cold Fill

- Pasteurization for ca. 20 Minute at approx 70°C
- Long term storage at room temperature, approx. 25°C.

The minimum filling volume of the packaging is dependent on the result of migration testing.

As there may be other, e.g. technical, limitations concerning the types of food and beverages, contact times and temperatures, pls refer to our Technical Datasheets and technical literature also. We recommend to confirm the suitability for the various applications through own tests and pack tests.

7. Legislation about Allergens, Regulation (EC) 1169/2011

The formulation of our above mentioned product does not contain the substances listed in annex II of Regulation (EC) 1169/2011, amended by Regulation (EU) 1155/2013 and (EU) 78/2014. The presence is therefore not to be expected.

8. Legislation about Genetically Modified Organisms (GMO), Regulations (EC) 1829/2003 and (EC) 1930/2003

Liner and coatings of this closures are mainly manufactured mainly from petro chemistry. Therefore, there is no potential for the presence of genetically modified organisms. Genetically modified organisms are not present.

However, in some cases, suppliers of some of the raw materials use additives that are manufactured using raw materials of plant or animal origin. Such organisms may be genetically modified. Typical examples are fatty acids and their derivatives for the production of lubricants and stabilizers. Such materials are not used unchanged, but undergo chemical reactions, forming different chemical entities.

According to our present knowledge, food contact materials are not within the scope of the Regulations mentioned above.

9. Legislation about BSE / TSE Risk Materials, Regulations (EU) 1069/2009 und (EU) 142/2011

Closure is made of steel and petrochemistry products. Therefore, there is no potential for the presence of BSE / TSE risk materials in the sense of the Regulations (EU) 1069/2009 and (EU) 142/2011.

Suppliers informed us that there may be trace amounts, which may be based on raw materials manufactured from animal origin. According to our suppliers, considering the processing conditions, these are not to be regarded as TSE/BSE risk materials.

10. Legislation about Bisphenol-A, Regulation (EU) 2024/3190

The Regulation (EU) 2024/3190 of 19th December 2024 "on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213", came into force on 20th January 2025. We confirm that no raw materials, as Epoxy derivatives (BADGE, BFDGE and NOGE) according to EU Directive 1895/2005 and Bisphenol A (BPA, CAS-No. 80-05-7), Bisphenol S (CAS-No. 80-09-1) and Bisphenol F (CAS-No. 620-92-8) or any other (hazardous) bisphenols have been intentionally or knowingly used in the raw materials for the manufacture of our closures. Accordingly, our closures comply with any applicable requirements of Regulation (EU) 2024/3190.

11. Legislation about used Packaging and Packaging Waste acc. to (EU) 2025/40 and Recycling / Toxics in Packaging Legislation

11.1 Product: Crown Caps for Beverage Bottles

Material Type: Metal Closure (Tinplate-Based) with Liner

Intended Use: Food Contact Packaging

11.2 Material Composition

Total unit weight: Approx 2.131 g

- Tinplate (steel with tin coating) or TFS (Tin-free steel): 91.5% (Approx 1.95 g)
- Liner (non-PVC): 7.5% (Approx 0.160 g)
- Coating / lacquer: 0.9% (Approx 0.020 g)
- Printing ink: 0.05% (Approx 0.001 g)

11.3 Recyclability

The product is recyclable within existing waste management systems. Metal is efficiently recovered through magnetic separation processes. The product is compatible with standard recycling streams for glass bottles and does not hinder their recycling. The small non-metal components (liner, coating, ink) do not significantly affect metal recycling performance.

11.4 Recycled Content

Metal contains approximately 50% recycled content. Recycled content is derived from a combination of post-consumer and post-industrial sources (as per supplier specification).

11.5 Hazardous Substances Compliance

The product complies with applicable legislation, including:

- Regulation (EC) No 1935/2004 on food contact materials
- Directive 94/62/EC on packaging and packaging waste (heavy metal limits).
- The liner is PVC-free.
- Toxics in Packaging Legislation: The content of heavy metals lead, mercury, cadmium, hexavalent chromium, phthalates and perfluoroalkyl substances (PFAS) is below 100 ppm.
- Pls refer sect. 14 below for PFAS

11.6 Packaging Minimization

The packaging design ensures minimum material usage (2.131 g per unit) while maintaining required mechanical performance, sealing integrity, and product safety.

We hereby declare that the above product complies with the applicable requirements under the Packaging and Packaging Waste Regulation (PPWR).

12. Legislation about Nano Scale Materials, 2011/696/EU

The formulation of mentioned material does not contain components with the intended purpose of imparting properties which are attributed to nano scale particles (engineered nano materials, ENM)

Some of the raw materials we use may contain a fraction of particles, which would fall, in the broadest sense, under the nano scale definition (<100 nm), but which are not engineered nano materials.

13. FDA legislation about indirect food additives

The components of the formulation comply with 21 CFR 177.1210 (closures with sealing gaskets for food containers) and this material is suitable for aqueous non fatty food, types I, II, IVB, VIA, VIB, under temperature conditions as severe as Condition of Use D — G (hot filled or pasteurized below 150F) as set forth in 21 CFR 177.1210 (c), table 4.

14. Per- and Polyfluoroalkyl Substances (PFAS)

Regulation (EU) 2025/40 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC applies to all packaging, regardless of the material used, and to all packaging waste, whether such packaging is used in or such packaging waste originates from industry, other manufacturing, retail or distribution, offices, services or households. Coated metal food packaging is in scope of the regulation, consequently coatings provided to the food packaging value chain are in scope of influence and impacted by the regulation. Per- and polyfluoroalkyl substances (PFAS) are a group of several thousand widely used synthetic chemicals that persist in the environment. PFAS have to be considered as ubiquitous and significant pollutants. Because of their widespread use and persistent properties, PFAS can be found in the environment, humans, animals, food and feed. Based upon information provided by our suppliers we hereby confirm that our closures constitutionally contain no PFAS, particularly also no Polytetrafluoroethylene (PTFE) and/or Perfluorooctanoic acid (PFOA) or other substances that might be considered PFAS. However, because of the ubiquitous occurrence of this group of substances, the presence of trace amounts of PFAS cannot be completely ruled out. **We hereby confirm that our closures will comply with all limits established in Chapter II Article 5 "Requirements for substances in packaging" 5. (a), (b), (c).**

However, it remains the responsibility of the customer to ensure that the finished product complies with the requirements of EU 2025/40 Article 5, since other elements used within the manufacturing process could still introduce contamination outside of our control.

15. Chemicals known to the State of California to cause Cancer or Reproductive Toxicity (Prop65)

Only used coating materials consist Formaldehyde (CAS-No. 50-00-0), Ethylbenzene (CAS-No. 100-41-4) and Napthalene (CAS-No. 91-20-3) in wet form. According to our knowledge and industry standard, we believe, that these substances will be present below analytical levels, after proper curing of the liquid lacquers, due to reaction processes or evaporation.

In that respect we can confirm compliance to Prop65 of the closure.

16. Japanese Legislation – Food Sanitation Act

The ingredients of closure components are listed in the Japan Positive Lists for Utensils, Containers and Packaging (Version Nov. 2023, which came into force on 1st June 2025). In addition we don't expect migration above the limits set by JFSL.

To the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. The legislation cited above applies to the final packaging, which is intended to come or is brought into contact with foodstuff. This statement however is restricted to the product as it leaves production. It is the customer's responsibility to verify compliance with applicable legislation of the final packaging under actual and foreseeable conditions of use

With best regards,

ALTINTAŞ AMBALAJ
SANAYİ VE TİCARET A.Ş.



Ugur Gazioglu
QAM



Stellungnahme zur Einhaltung der Verordnung (EU) 2025/40 über Verpackungen und Verpackungsabfälle (PPWR) Artikel 5 Absatz 5

02.2026

Die bei der Helmut Brüninghaus GmbH & Co. KG hergestellten Kronenkorken sind Lebensmittelkontaktmaterialien und erfüllen die einschlägigen Anforderungen des geltenden europäischen Lebensmittelrechts, insbesondere der Verordnung (EG) Nr. 2004/1935 sowie der Verordnung (EU) Nr. 2011/10, soweit anwendbar.

Im Hinblick auf die künftige Verordnung (EU) 2025/40 über Verpackungen und Verpackungsabfälle (PPWR), die ab dem 12. August 2026 zur Anwendung kommt, bestätigen wir, dass unsere Kronenkorken bereits heute **unter Berücksichtigung der bekannten und absehbaren Anforderungen der PPWR** entwickelt und hergestellt werden.

Bezugnehmend auf per- und polyfluorierte Alkylsubstanzen (PFAS) erklären wir, dass unsere Kronenkorken ohne den gezielten Einsatz von per- und polyfluorierten Alkylsubstanzen (PFAS) hergestellt werden. Im Rahmen der Materialauswahl und der Lieferkettenkontrolle werden keine PFAS-haltigen Stoffe gezielt verwendet. Die Produkte gelten damit als **PFAS-frei im Sinne „frei von absichtlich zugesetzten PFAS“**. Etwaige technisch unvermeidbare Spuren liegen – sofern nachweisbar – unterhalb relevanter Grenz- bzw. Nachweisgrenzen und haben keinen Einfluss auf die Lebensmittelsicherheit oder die regulatorische Konformität der Produkte.

Die Entwicklung und Herstellung unserer Kronenkorken erfolgt bereits heute in Ausrichtung auf die ab August 2026 geltende oben genannte Verordnung, sodass die Konformität zum Zeitpunkt ihres Inkrafttretens sichergestellt ist.

Helmut Brüninghaus GmbH & Co. KG


Ina Feddersen
Leitung Qualität · HSE

Declaration of compliance

REGULATION EU 2025/40 - PPWR

Name and address of the company:

SOLOCAP MAB - 130 Chemin des lacs, 88140 Contrexéville, FRANCE

Declare that the packaging component above complies with the requirements of REGULATION EU 2025/40 of 19 December 2024, on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC

Ref : **Metallic crown cork with molded liner (Xscel/Scel++/Scel+) and insert (802/861/O1)**

Compliance with articles 5 to 12 (EN 2025/40):

- ☒ Crown cork produced before sept 2025
The overvarnish applied on the external side during the coating process until august 2025 did contain raw material with PFAS in a very low proportion. By worst calculation, we demonstrate that the quantity is far below the threshold of 25ppm per crown cork.

Crown cork produced from sept 2025

Based on our technical knowledge and our converting process, this product does not contain intentionally added PFAS. According to the formulation and the upstream information available from our suppliers, there is no use of raw materials that constitutionally contain the following substances and there are not intentional use during our production:

Per- and poly-fluoroalkyl substances (PFAS), including PFOA (perfluorooctanoic acid, CAS 335-67-1) and PFOS (perfluorooctane sulfonates, CAS 1763-23-1)

- ☒ Recyclable plastique use
- ☐ Minimum recycled content
- ☒ Biobased feedstock (available on demand)
- ☐ Compostable / Reusable
- ☒ Optimized design and minimized weight

Heavy metals: compliance within regulatory limits

- concentration in lead+cadmium+mercury+hexavalent chrome < 100ppm

CONTREXÉVILLE, 28 mai 2026



L. VANNINI
QHSE director