

Declaration of Compliance

PPG2845-801/A Clear Aerosol Internal Liner

Intended use: Internal liner for spray application of extruded bottles and cans made of aluminium. Use and suitable in permanent direct food contact.

Assessment:

- **EU: Regulation (EC) No. 1935/2004**

The European Union Regulation (EC) No. 1935/2004 “concerns materials and articles intended to come into contact with food” and repeals Directive 80/590/EEC and Directive 89/109/EEC.

If applied and cured for the intended end-use following our recommendations of our datasheets, we hereby confirm, that the product PPG2845-801/A will comply with the requirements set out in Article 3 of Regulation (EC) No. 1935/2004. Namely that the above mentioned product is sufficiently inert to preclude substances from being transferred to food in quantities large enough to endanger human health, or bring about an unacceptable change in the composition of the food, or a deterioration in its organoleptic properties (SQTS – Swiss Quality Testing Services, Dietikon, Switzerland, Reference-No. 2010L07930/1, dated 13 April 2010).

- **Germany: LFGB**

In the circumstances of the destined and expected usage the product PPG2845-801/A complies with the requirements of the § 31 paragraph 1 of the LFGB (German Code of Law for Food and Feeds) and is eligible for the manufacture of commodities as defined by § 5 paragraph 1 No. 1.

- **EU: Commission Regulation (EC) No. 1895/2005**

For the manufacture of the product PPG2845-801/A no epoxy resin and no novolac resin is used. We are therefore confident, that the product will meet the requirements of the Commission Regulation (EC) No. 1895/2005 of 18 November 2005 “on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food”.

- **EU: Commission Directive 2002/72/EC**

With regard to its composition and the migration behaviour the product PPG2845-801/A meets the compositional requirements of the Commission Directive 2002/72/EC, relating to plastic materials and articles intended to come into contact with foodstuffs, latest amendment Commission Regulation (EC) No. 975/2009.

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

All of the monomers and starting substances, used in PPG2845-801/A are listed among others in the ... / ...

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CEPE Code of Practice, in the Framework Resolution ResAP(2004)1 „on coatings intended to come into contact with foodstuffs“, version 3, dated 12 February 2009, or in Resolution ResAP(92)2.

The following specific migration limits and/or other restrictions have to be considered:*

Substance	SCF list	CAS No	Restriction	Remark
1,1,1-Trimethylolpropane	2	000077-99-6	SML = 6 mg/kg	Code of Practice
2,2-Dimethyl-1,3-propanediol	3	000126-30-7	SML = 0.05 mg/kg	Code of Practice
2-Methyl-1,3-propanediol	3	002163-42-0	QMA = 5 mg/6dm ²	Code of Practice
2,4-Diamino-6-phenyl-1,3,5-triazine (Benzoguanamine)	3	000091-76-9	SML = 5 mg/kg	Code of Practice
Adipic acid	1	000124-04-9	SML = 5 mg/kg	Code of Practice
Dibutyl tin oxide (DBTO)	-	000818-08-6	SML = 0.05 mg/kg	ResAP(92)2
Diethylene glycol	2	000111-46-6	SML(T) = 30 mg/kg	Code of Practice
Dodecylbenzene-sulphonic acid	2	027176-87-0	SML = 30 mg/kg	Code of Practice
Formaldehyde	3	000050-00-0	SML(T) = 15 mg/kg	Code of Practice
Isophthalic acid	3	000121-91-5	SML = 5 mg/kg	Code of Practice
Maleic acid	2	000108-31-6	SML = 30 mg/kg	Code of Practice
Melamine	2	000108-78-1	SML = 30 mg/kg	Code of Practice
Phthalic acid anhydride	2	000085-44-9	ADI/TDI = 1 mg/kg	Code of Practice
Terephthalic acid	2	000100-21-0	SML = 7.5 mg/kg	Code of Practice

* The substance regulatory data provided by PPG is based upon the substance data either known to PPG or provided to PPG by its raw material suppliers at this time. Some suppliers have, for proprietary reasons, refused to identify all substances present in the products they supply to PPG. However in order to address all interests and to be in compliance with the law the identity of all monomers and starting substances, not disclosed to us, have been submitted to the testing laboratory SQTS – Swiss Quality Testing Services, Dietikon, Switzerland.

• USA: US FDA 21 CFR § 175.300

With respect to the ingredients as well as the migration behavior the non volatile components of PPG2845-801/A meet the requirements of the FDA Regulation 21 CFR § 175.300 „Resinous and polymeric coatings“.

• Ingredients

We hereby declare, that in the manufacture of the product PPG2845-801/A no deliberate or knowing addition of the below mentioned substances is made:

- BADGE, Bisphenol A, BFDGE, Bisphenol F, NOGE
- Polyvinyl chloride (PVC), Polyvinylidene chloride (PVDC)
- Epoxidised soybean oil (ESBO), epoxidised linseed oil (ELO), Adipates, Citrates
- Phthalates: Dibutylphthalate (DBP), Diethyl phthalate (DEP), Diisononyl phthalate (DINP), Diethylhexylphthalate (DEHP), Di-isodecylphthalate (DIDP), Dimethyl phthalate (DMP), Di-n-octylphthalate (DNOP),

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... / ...

- Dipentylphthalat (DnPP), Di(isopentyl)phthalat (DiPP), Benzylbutylphthalate (BBP)
- Ethylene glycol methyl ether (EGME, CAS-No. 109-86-4), Ethylene glycol ethyl ether (EGEE, CAS-No. 110-80-5), Ethylene glycol methyl ether acetate (EGMEA, CAS-No. 110-49-6), Ethylene glycol ethyl ether acetate (EGEEA, CAS-No. 111-15-9), Ethylene glycol dimethyl ether (EGDME, CAS-No. 110-71-4), Triethylene glycol dimethyl ether (TEGDME, CAS-No. 112-49-2), Diethylene glycol monomethyl ether (DEGME, CAS-Nr. 111-77-3), Diethylene glycol dimethyl ether (DEGDME, CAS-No. 111-96-6), 1-Propylene glycol 2-methyl ether (1PG2ME, CAS-No. 1589-47-5), 1-Propylene glycol 2-methyl ether acetate (1PG2MEA, CAS-Nr. 70657-70-4)
 - 2,2-Dimethoxy-2-phenylacetophenone, 2-benzotriazol-2-yl-4,6-di-tert-butylphenol, 2-Ethyl-Hexanoic Acid (2-EHA) or its salts, 4-hydroxy-benzophenone, 4-methylbenzophenone, Acetyl Acetone (2,4-Pentanedione), Asbestos, Azo compounds, Azodicarbonamide (ADC), Benzophenone, Beryllium oxide, Beryllium copper, Dimethyl fumarate (DMF), Natural Rubber Latex, Nanomaterials, Nickel (Ni), Nitrosamines, Polypropylene carbonate (PPC), Polycyclic Aromatic Hydrocarbons (PAH), Primary Aromatic Amines (PAA), Rosin, Semicarbazide (SEM), Thioacetamide, Titanium Acetylacetonate (TAA), Triazine, Triclosan, Triphenylphosphine
 - ITX: 2,4-diethyl-9H-thioxanthen-9-one (DETX), CAS-No. 82799-44-8, Mixture of 2-isopropyl-9H-thioxanthen-9-one and 4-isopropyl-9H-thioxanthen-9-one (ITX), CAS-No. 5495-84-1 and 83846-86-0, 2-isopropyl-9H-thioxanthen-9-one (2-ITX), CAS-No. 5495-84-1, 2-chlorothioxanthen-9-one (2 CTX), CAS-No. 86-39-5 and 1-Chloro-4-propoxythioxanthen-9-one (CPTX), CAS-No. 142770-42-1
 - Organotin compounds: Monobutyltin (MBT), Dibutyltin (DBT), Dioctyltin (DOT), Tributyltin (TBT), Triphenyltin (TPT)
 - Polybrominated biphenyls (PBB), polybrominated diphenyl ether (PBDE), Decabromodiphenyl ether (DecaBDE), other brominated organic compounds, polychlorinated biphenyls (PCB), polychlorinated naphthalenes, polychlorinated terphenyls, short chain chlorinated paraffines (SCCP), other organic compounds
 - Perfluorinated hydrocarbons (PFC): Perfluorooctanic Acid (PFOA), Perfluorooctane Sulfonate (PFOS)
 - Ozone-depleting substances, halogenated hydrocarbons, Hydrofluorocarbon (HFC)

Further, none of the constituent raw materials is specified by its supplier to contain any of the above mentioned substances as a by-product or a significant impurity.

• Bisphenol A (BPA), Bisphenol F (BPF)

We hereby declare, that in the manufacture of the product PPG2845-801/A no Bisphenol A (BPA) or Bisphenol F (BPF) or any material known to contain it is used. Further, none of the constituent raw materials is specified by its supplier to contain Bisphenol A or Bisphenol F as by-products or significant impurities.

• Dual Use Additives

We hereby declare, that in the manufacture of the product PPG2845-801/A the following Dual Use Additive is used: phosphoric acid (E 338).

• BSE (Bovine Spongiform Enzephalopathy) / TSE (Transmissible Spongiform Enzephalopathy)

We hereby declare that for the product PPG2845-801/A no deliberate or knowing addition of raw materials of animal origin is made in its manufacture. Further, none of the raw materials purchased for the production of the above named product are specified by its supplier to contain any substances of animal origin as significant impurities. Therefore it can be precluded, that the product contains any substances, that cause bovine spongiform encephalopathy (BSE), that belongs to a group of diseases known as transmissible spongiform encephalopathies (TSE).

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- **EU/USA: Directive 94/62/EC, CONEG**

We hereby declare, that in the manufacture of PPG2845-801/A no deliberate or knowing addition of toxic metals or heavy metals, specifically lead, cadmium, mercury and chrome (VI), is made and the product does therefore constitutionally not 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 limit specified by the European Council and Parliament Directive on Packaging and Packaging Waste 94/62/EC (December 1994) as well as the American CONEG Regulation (January 1994).

- **References**

- **Regulation (EC) No. 1935/2004** of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food
- **LFGB** - Code of Law for Food and Feeds, Germany
- **Regulation (EC) Nr. 1895/2005** of the European Parliament and of the Council of 18 November 2005 on the restriction of use of certain epoxy derivatives
- **Code of Practice** for coated articles where the food contact layer is a coating
- **Framework Resolution ResAP(2004)1** on coatings intended to come into contact with Foodstuffs, version 3, dated 12 February 2009
- **Resolution ResAP(92)2** of the Council of Europe "On control of aids to polymerisation"
- **Commission Directive 2002/72/EC** of 6 August 2002 relating to plastic materials and articles intended to come into contact with foodstuffs
- **Commission Regulation (EC) 975/2009** of 19 October 2009, 6th amendment of Directive 2002/72/EC
- **US FDA 21 CFR § 175.300** „Resinous and polymeric coatings“, USA
- **Directive 94/62/EC** of the European Parliament and of the Council on packaging and packaging waste of December 1994
- **CONEG**, issued January 1994, USA

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- **Validity**

This assessment refers exclusively to the product **PPG2845-801/A**. It will remain valid unless the composition or the specification of constituent raw materials is changed, regulations relevant to this product are changed or amended or new and relevant toxicological data on known chemical constituents of the product is published.

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