

TO WHOM IT MAY CONCERN

**Declaration of Compliance (DoC)  
Beer and Beverage Cans  
coated with the internal lacquer EcoDex 4020W01**

Ardagh Metal Packaging Europe GmbH (AMP-E)  
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**Concerning cans of all available sizes**

Customer Information Manual and technical drawings:  
04 5 1 53 150 1 01 - 04 5 1 66 568 1 04

Based on written confirmations from our suppliers and the available certificates from independent institutes AMP-E herewith declares that our beer and beverage cans comply with the requirements of Art. 3, 15 (2) and 17 of Regulation (EC) No 1935/2004.

The compliance of the internal lacquer EcoDex 4020W01 with Art. 3 is ensured by reviewing its properties considering criteria specified in:

- the Resolution AP (2004) 1 of the Council of Europe and
- the CEPE CoP (Code of Practice).

Furthermore, the internal lacquer fulfils the requirements of the US-FDA Regulation 21 CFR 175.300 and/or is subject to FCN - Food Contact Substance Notification.

The internal epoxy lacquer EcoDex 4020W01 used for our beer and beverage cans is evaluated to be in compliance with:

- COMMISSION REGULATION (EU) No 2018/213 of 12 February 2018 on the use of bisphenol A in varnishes and coatings intended to come into contact with food and amending Regulation (EU) No 10/2011 as regards the use of that substance in plastic food contact materials.

A separate DoC for BPA reflecting the requirements for a DoC according to this Regulation is available for download in the Customer Information Manual.

- 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.

Migration tests have been carried out in accordance with Commission Regulation (EU) No 10/2011 (PIM) and related amendments.

The food contact surface area to volume ratio for which compliance has been verified is 8,3 dm<sup>2</sup> = 1 kg. If the provisions of Art. 7 No. 3 of the CEPE Code of Practice for Coated Articles are taken into account, this surface area to volume ratio represents the worst case for a seamed can from our range.

According to the test results obtained using 3 % acetic acid and 50 % ethanol as simulants, the cans coated with EcoDex 4020W01 are suitable for contact with water products, acidic and alcoholic beverages (including, but not limited to beer, soft drinks, milk products, carbonated water products) up to sterilisation conditions at 130 °C for 0,5 hours, followed by long term storage at room temperature or below.

The migration tests to establish compliance with specific migration limits (SML) were conducted under the following conditions: 130 °C for 0,5 hours, then 60 °C for 10 days representing a storage time of more than 6 months. Overall migration was tested at 130 °C for 0,5 hours, then 40 °C for 10 days.

No dual use substances have been identified by the testing institute.

Further confirmations:

- the internal lacquer is PVC-free
- the migration of substances from the direct food contact material meets the criteria of the respective Chinese standards (GB 4806.1, GB 9685, and GB 4806.10)
- the applied external inks enable compliance with
  - the EuPIA Exclusion Policy for Printing Inks and Related Products and/or
  - CoE Resolution AP (2005) 2 and/or
  - Swiss Ordinance 817.023.21
- the external lacquers have been formulated according to
  - CEPE CoP for coated articles and/or
  - US-FDA Regulation 21 CFR and/or
  - CoE Resolution AP (2005) 2 and/or
  - Swiss Ordinance 817.023.21 and/or
  - CoE Resolution AP (89) 1 and/or
  - the EuPIA Exclusion Policy for Printing Inks and Related Products
- all neck lubricants are of food grade quality
- the aluminium meets the requirements of EN 602:2004
- the sum of concentrations of lead, cadmium, mercury, and chromium VI is below the level of 100 ppm as required by
  - the European Directive 94/62/EC on Packaging and Packaging Waste and
  - the US Model Toxics in Packaging Legislation (formerly CONEG).

Moreover, AMP-E can confirm that our production is in accordance with Commission Regulation (EC) No 2023/2006.

Alwina Kurz  
 Food and Material Regulatory Specialist  
 January 2022

**This is an electronic statement and is not signed.**

**This information is given according to the best of our knowledge. It is the responsibility of the downstream users to ensure that the packaging materials are handled according to GMP, and to verify the suitability for the intended application.**

**This statement shall be renewed to reflect any changes in the legal situation for the above-mentioned materials and/or in migration levels from the coating that has been applied to our beer and beverage cans.**

**Please check our website regularly for updated versions.**