

Supplier's declaration on packaging material components according to the law relating to food and drugs

Update	Modifications
08.12.2004	Initial version
13.04.2006	Version update
07.06.2006	Version update
28.07.2008	Version update
30.12.2008	Version update
10.01.2010	Version reviewed
05.03.2012	Version reviewed/update
30.04.2012	Version reviewed
10.01.2014	Version reviewed
11.11.2014	Version reviewed/update
08.01.2015	Version reviewed
03.02.2016	Version reviewed
20.04.2016	Version reviewed
09.01.2017	Version reviewed
04.01.2018	Version reviewed
09.01.2019	Version reviewed
10.01.2020	Version reviewed
03.04.2020	Version reviewed, Update T116
08.01.2021	Version reviewed
17.01.2022	Version reviewed
09.03.2022	Update - Packaging identification for Italy

General:

Glass containers supplied to Buyer will comply with all applicable and food contact packaging materials legislation in place at the time of production in the country or countries where the glass containers are produced and/or shipped by O-I.

1. Food law related clearance certificate

Legal bases, enactments, regulations and directives:

- Food and Feeding Stuff Law (LFGB), 3 June. 2013
 (BGBI. I No. 27, from 10 June 2013 p. 1426), last change by Art. 28 from 20 Nov. 2019
 (BGBI. I p. 1626).
- § 30 LFBG; Prohibitions for health protection
- § 31; clause 1 LFBG; migration of substances into food

We hereby assert and confirm that no substances, which can be health-hazardous or affect the filling by taste, smell or visually do migrate from the glass containers made by us under normal or foreseeable conditions of use within the meaning of the legal regulations mentioned above.

2. HACCP declaration



Legal bases, enactments, regulations and directives:

- Regulation (EC) No 852/2004 on the Hygiene of Foodstuff; dated 29 April 2004,
- Food Hygiene Ordinance (LMHV), dated 8 August 2007, (BGBI. I No. 39)
- Food, Consumer Goods and Feeding Stuff Law (LFGB), 3 June. 2013 (BGBI. I No. 27, from 10 June 2013 p. 1426), last change by Art. 28 from Nov. 2019 (BGBI. I p. 1626).

We confirm, as a supplier of high-quality packaging for the food industry, that we have implemented a HACCP system adapted to production in accordance with the principles of the above-mentioned guidelines and regulations in the manufacturing process.

The HACCP (Hazard Analysis and Critical Control Points) concept required by the EC Food Hygiene Regulation (852/2004/EC) has become part of the company's quality assurance scheme in the food industry.

3. Good Manufacturing Practice (GMP-Regulation)

Legal bases, enactments, regulations and directives:

 Regulation (EC) No. 2023/2006; dated 22 Dec. 2006 on good manufacturing practice for materials and articles intended to come into contact with food

We hereby assert and confirm that the products made by us are compliant with the above mentioned GMP-Regulation on good manufacturing practice for materials and articles intended to come into contact with food. We refer specially to article 5 (quality assurance system), article 6 (quality control system) and article 7 (documentation).

4. Condition of glass and migration of substances into foodstuffs

Legal bases, enactments, regulations and directives:

- EC directive 1935/2004; dated 27 October 2004
- DIN ISO 719, state 1989-12; water resistance of finely crushed glass at 98° C, test processes and classification

We confirm that the glass actually produced by us corresponds to a conventional soda-lime glass and is tested according to DIN ISO 719, which means that the glass containers produced do, on account of a consumption of no more than 0.85 ml hydrochloric acid (0.01 Mol/l) per gram of crushed glass, correspond to the 3rd hydrolytic class.

We confirm in compliance with the provisions of the EC directive 1935/2004 that our glass containers do not emit any substances under normal or foreseeable conditions of use in volumes that are qualified

- > to endanger the human health or
- > to cause an indefensible modification to the composition of the foodstuffs filled in or
- to cause an impairment of the organoleptic characteristics of the foodstuffs.



5. Packaging Act

Legal bases, enactments, regulations and directives:

- Article 11 of the European Packaging Directive 94/62/EU dated 20 Dec. 1994 (amended by Directive 2018/852 dated 30 May 2018) in conjunction with the decisions of the EU-Commission 2001/171/EU dated 19th of February 2001 and 2006/340/EU dated 8 May 2006.
- German Packaging Act dated 5 July 2017

We hereby confirm that glass containers delivered by us are compliant with § 5 "Restrictions of substances" Packaging Act concerning heavy metals (lead, cadmium, mercury and chromium VI).

Please refer to Standard Sheet T 134 " Glass packaging: Recyclability and use of recyclates according to § 21 Packaging Act".

6. Traceability

Legal bases, enactments, regulations and directives:

EC regulation 1935/2004, article 17, dated 27 October 2004

We confirm that we, based on the information imprinted on the pallet label, are able to meet the traceability requirements with regard to materials and objects that are determined to come into contact with food as specified and set out in the EC regulation 1935/2004.

The EC regulation 1935/2004 requires, among other things, that the traceability of materials and objects determined that come into contact with food, must be secured in order to facilitate controls, the callback of non-conforming or faulty products, the information of the consumer and the determination of the corresponding liability.

The companies concerned must, in due consideration of the technological feasibility, dispose of systems and procedures that enable to find out from whom to which company the materials or objects or, if applicable, the products or substances used for their production coming under said directive and the appurtenant implementing provisions have been supplied or from which company they have been procured.

7. Declaration concerning the REACH-Regulation

Legal bases, enactments, regulations and directives:

Regulation (EC) No. 1907/2006 of the European Parliament and of the Council 18
 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of
 Chemicals (REACH) as amended by the Commission Regulation (EC) No 987/2008 8
 October 2008 as regards Annexes IV and V of Regulation (EC) No. 1907/2006



We confirm that, that all raw materials on the supply chain side, which are being used within our manufacturing process of glass are compliant with the requirements of the REACH-Regulation, especially in case a registration should be necessary.

The products of the glass industry (e.c. glass container made for packaging use) are articles in the meaning of the REACH-Regulation, because the function is mainly determined by form, design and surface and not by its chemical composition. Therefore, no obligation exists to register these articles according to the REACH-Regulation.

8. Guide for the evidence of conformity

Legal bases, enactments, ordinances and directives:

- 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 foodstuffs and to repeal Directives 80/590/EEC and 89/109/EEC (Official Journal of the European Union L 338/4 of 13 Nov. 2004)
- German Consumer Goods Ordinance as amended by the notice of 23 December 1997 (BGBI. 1998 I p. 5), last amended by Article 5 of the Ordinance of 13 December 2011 (BGBI. I p. 2720)
- Directive 94/62/EC on packaging and packaging waste and Directive (EU) 2018/852 amending Directive 94/62/EC
- Commission Regulation (EC) No 1895/2005 of 18 November 2005 restricting the use of certain epoxy derivatives in materials and counterlevels intended to come into contact with foodstuffs (Official Journal of the European Union L 302/28 of 19 November 2005)
- European series of standards DIN EN 13427 ff. as of 2004-10

Regulation (EC) No 1935/2004 requires, in accordance with Article 16, to make declarations of conformity mandatory, provided that individual measures provide to attach of a written declaration that the foodstuffs comply with the applicable rules.

These individual measures within the meaning of Framework Regulation (EC) 1935/2004, i.e. specific regulations and quality requirements for individual materials, are for food articles made of plastic, ceramics and regenerated cellulose. These individual measures are implemented in the German Bedarfsgegenständeverordnung (Ordinance). The European regulation on the restriction of certain epoxy derivatives also applies.

There are no specific legal regulations for food articles (e.g. food packaging) from other materials, such as glass, steel, aluminium, paper and corrugated board, and therefore no obligation to issue declarations of conformity. The general requirements of Regulation (EC) No 1935/2004, such as the requirement of good manufacturing practice, inertness and traceability, apply alone.

9. Using of Isopropylthioxanton – ITX, Bisphenol A

We confirm that during our article productions and control ITX and Bisphenol A is not used. (Guideline EG 1935/2004 – transfer of substances to food-stuffs)



10. FDA - Glass is GRAS

Glass is "Generally Recognized As Safe" (GRAS) by the FDA for Food and Beverage Contact and the F. D. A. has on several occasions also advised that soda lime glass containers are not food additives on the basis that such containers may not reasonably be expected to become a component of food or otherwise affect the characteristics of food and beverages under their intended condition of use.

Norbert Lang

Quality Manager Germany

Appendix:

description: standard pallet label O-I Germany overview legislations packaging materials



DE95

ISO 9001 Quality Management ISO 22000 Food Safety Management Für Reklamationen bitte Palettenzettel aufbewahren! / For complaints please keep pallet label! Plant: Holzminden Environmental labelling: GL.70 Glass container: Alter Postweg 3 Product of PP 5 Carton: **PAP 20** Interlayer: 37603Holzminden Germany **FOR 50** LDPE 4 +49 5531 121 0 456 +49 5531 121 115 www.o-Lcom Packaging SAP Sales **08US1** Rem number Pred. Date 16-12-21 4.750 **Second Line of Optional Text** Pallet-Kumber Schicht Kunden-Mat. -Nr.: 5000001 311069299901060335 English In Sertioner

TEST PALETTE



(01) 1 3250261 18624 9 (11) 211216 (10) 3511213550



(00) 1 3250263 511355335 1

PalHoHLZ Schr.-Gode 0335 01



Barcode: nach UCC/EAN 128



(00)132502648340070010

Identifier (00) Number of Delivery Unit

Production Year : 1

ILN-Number **O-I** : 325026

Plant-ID : **48** (04, 40, 35, 48)

Production Line : 34

Batch-/Lot-Number : **007** 001 - 999 Pallet Number : **001** 001 - 998

Check Digit : 0

Packaging identification for Italy (according to EU 97/129 EC) from 2022



Glas Container: GL 70 flint glass, GL 71 green glass, GL 72 amber glass

Interlayer: PP 5 Polypropylene

Foil: LDPE 4 Low Density Polypropylene Carton: PAP 20 Corrugated Cardboard

Pallet: FOR 50 Wood



Barcode: nach UCC/EAN 128



(01)13250261031303(11)110106(10)4834110070

Identifier (01) EAN of Handle Unit

Leading Character: 1 Identifier for Pallet

ILN-Number **O-I** : 325026

Material Number : 103130 SAP-Number.

Check Digit : 3

Identifier (11) Production date

Production Date : 110106 JJMMTT

Identifier (10) Batch/Lot

Plant-ID : **48** (04, 35, 40, 48)

Production Line : 34
Production Year : 11

Batch-/Lot-Number : **007** 001 - 999

Resorting : 0 - 9



Food Container

Product of Germany

DE402484

Old material number from SAP with Country code i.E.: "DE" = Germany

518Gross Weight of the Pallet

Barcode on the right side : Depend on the Plant.

Possibility for Barcode or other internal needed Information.

Fields and visual Indicator in the Forms:



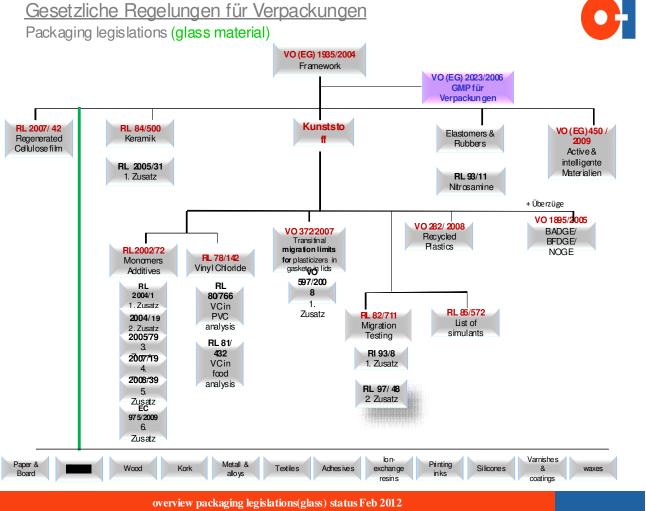
Pallets must be storage under the roof, maximum Stack height 3 Pallets in connected form.

Free place up to the O-I Barcode:

Place for a Customer requested Barcode or Information

Plaintext of Barcodes:

SSCC: 1325026 4834007001 0 BATCH/LOT: 4834110070 006 GTINIEANI: 1325026 103130 3



Packaging declaration Germany with new pallet label 09032022.docx

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