



DECLARATION OF COMPLIANCE

We, the undersigned, O-I Netherlands, represented by Mr. Edwin Plomp – Quality Leader Central Europe- certify that the soda-lime-silica glass packaging - produced by OI Maastricht

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. Heavy metal thresholds for container made of glass

Legal bases, enactments, ordinances and directives:

- European Packaging Directive 94/62/EU, article 11, dated 20/12/1994 in conjunction with the EC decision 2001/171/EU dated 19/02/2001 and 2006/340/EU dated 08/05/2006
- French Decree No. 98-638 of July 20th, 1998
- Dutch Packaging and Food Utensils Regulation (Regelingen Verpakkingen en Gebruiksartikelen: RVG, 14 maart 2014)

We hereby assert and confirm, that glass containers delivered by us are compliant with the specifications concerning heavy metals (lead, cadmium, mercury and chromium VI) required by the above mentioned Directive and Regulation.

2. Food law related clearance certificate

The food and feeding stuff law has been new regulated fundamentally in the dutch "Warenwet" (Dutch Food and Drugs Law).

Legal bases, enactments, ordinances and directives:

- Dutch Food and Drugs Law (Warenwet), 28 december 1935.
- Chapter V of the RVG; 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 within the meaning of the legal regulations mentioned above.

3. HACCP declaration

Fundamental legislation:

- Regulation (EC) No 853/2004 on the Hygiene of Foodstuff; dated 28th of April 2004,
- Warenwetbesluit hygiëne van levensmiddelen, 3 oktober 2005.

A handwritten signature in black ink, appearing to be 'E. Plomp', with a date '27/11/2014' written below it.

The HACCP concept (**Hazard Analysis and Critical Control Points** = system for risk analyses and supervision of critical points) required by the Regulation (EC) No 853/2004 on the Hygiene of Foodstuff has become a constituent of the operational quality assurance implemented within the food industry. In view of the fact, that containers made of glass assume a certain importance with regard to the safeguarding of the production of Foodstuffs, the container shall not interact as an origin of health risk. The glass container rather represents protection for the food filled in.

As an important supplier of high-quality glass containers for the food industry, it was our important task to implement a HACCP system in our production process, that has been developed by the container glass industry in compliance with the directives, enactments and ordinances specified hereinbefore.

4. Migration of substances into foodstuffs

Legal bases, enactments, ordinances and directives:

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

The glass actually produced 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 hereby assert and confirm in compliance with the provisions of the EC directive 1935/2004 that our glass containers do not emit any substances 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. Guide for the evidence of conformity

Legal bases, enactments, ordinances and directives:

- EC Packaging Directive 94/62/EU dated 20th of Dec.1994 in conjunction with the EC decision 2001/171/EU; dated 19th of Feb. 2001 and 2006/340/EU; dated 8th of May 2006
- European standard series DIN EN 13427 ff, state 2004-10

We hereby assert and confirm that, on the basis of the directives specified hereinbefore, the packaging requirements, conformity obligations and procedures mentioned in the guide for the evidence of the conformity have been and are all followed and adhered to during the production and the control of our products.

6. Declaration concerning the REACH-Regulation

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

The products of the glass industry (e.c. container made of glass 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. The companies of the glass industry are actually in dialogue with their suppliers to assure, that only substances which are compliant with REACH will be obtained and used.

Glass would be considered as a material in the view of REACH (Appendix V, 11). The products of the glass industry are completely made from glass and that material isn't listed in a so called candidate list. Therefore no reporting requirements for REACH article 33 necessary for articles made from glass.

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

Container glass as a UVCB substance is exempted from registration under REACH Regulation as amended by Regulation 987/2008 annex II 11 as it does not contain "available dangerous constituents" as set out in the exemption. This is supported by peer-reviewed scientific experimental data.

Moreover, container glass fully conforms to the principles previously confirmed by the Commission for substances included in Annex V set out in Document CASG (annexes) 11/2008) and in particular §3.2.2.1., as an appropriate high level of health and environmental protection is properly controlled by other legislation (Food contact, Packaging and Packaging Waste, IPPC, worker protection).

7. Traceability

Legal bases, enactments, ordinances and directives:

- EC directive 1935/2004, article 17, dated 27th of October 2004

Among other things, the EC directive 1935/2004 also requires that the traceability of materials and/or objects determined to get into contact with food, must be secured in order to facilitate controls, the callback of nonconforming or faulty products, the information of the consumer and the determination of the corresponding liabilities. The companies concerned must, in due consideration of the technological feasibility, dispose of systems and procedures that enable to find out from which 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.

We hereby assert and confirm that we, based on the information imprinted on the palette label, are able to meet the traceability requirements with regard to materials and or objects that are determined to get in contact with foodstuffs as specified and set out in the EC directive 1935/2004.

- EC-Regulation No. 1935/2004 Traceability of food – laying down procedures in matters of food safety:

Through this regulation the traceability of food is expected at all stages of production, processing and distribution.

We are as a supplier to the food producing and –filling industry as a packaging supplier affected by the regulation as follows:

The part relevant for the ranks traceability of the regulation is article 17, paragraph 1-3. The main points of the ranks traceability describe the information on side of the supplier and the complaint on side of the customer.

When a supplier informs about the faulty of raw material, we have to determine which ranks are affected by it, to turn away danger from the customer.

At a customer's complaint the manufacturers and the relevant suppliers have to be informed. The traceability of all deliveries has to be established. With the information of both sides faulty products can be fast taken from the market if necessary, to turn away danger from the customer.

As a supplier of packaging we satisfy this regulation with our quality management system to DIN EN ISO 9001, version Matrix 2000 and our HACCP system for the risk analysis and supervision of critical points.

The traceability as an essential element is steered by the pallet labels of our transportation units. All necessary information is to be taken from the pallet labels. Internal notes allow exact conclusions of the production time period.

The used identification method bases on a code EAN 128 standard as a NVE/SSCC (Serial shipping container code).

Among other things essential elements of this coding standards can be seen in the appendix.

A standard pallet label is also enclosed in the appendix.

8. Good Manufacturing Practice (GMP-Regulation)

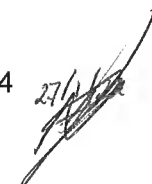
Legal bases, enactments, ordinances and directives:

- Regulation (EC) No. 2023/2006; dated 22nd of Dec. 2006

We hereby assert and confirm that as of 1st of Aug. 2008 at the latest (begin of validity) 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 especially to article 5 (quality assurance system), article 6 (quality control system) and article 7 (documentation).

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)

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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.

11. Allergens statement

Food allergens, such as those listed in Directive 2007/68/EC, are not deliberately used in the manufacture of containers produced by the Manufacturing plants. The raw materials which are used to manufacture glass containers are inorganic materials which would therefore not be expected to contain allergens.

Furthermore, during the glassmaking process the raw materials are heated to temperatures in excess of 1500°C. Any food allergens, such as those listed in the above directive, would therefore be destroyed by the temperatures used in the melting process. An organic cold end surface treatment is applied to the bottles after the melting and forming stages of the process. The supplier of the cold end surface treatment materials used (type EA79) has provided O-I with statements of non-use and therefore expected absence of allergens in their products.

12. MOSH/MOAH/POSH

Mineral Oil Saturated Hydrocarbons (MOSH), Mineral Oil Aromatic Hydrocarbons (MOAH), or Polyolefinic Oligomeric Saturated Hydrocarbons (POSH) are not intentionally added as ingredients to the glass batch formulations at. Nor would we expect such compounds to be present in the final glass composition due to the extremely high temperatures used in the glass manufacturing process.

The producing plant applies an ink jet code to the outside surface of the glass containers. However, glass is recognized as a material that provides a barrier to the migration of such materials applied to the outside surface to the contained product.

13. GMO and Food hazard.

O-I is a manufacturer of glass packaging using soda lime silica glass. There are no GMOs involved in the process. The basic raw materials for the glass are mineral in origin. Plant which has been certified to the FSSC22000 (packaging) standard cover the Food Hazard via this system. Part of the requirements involve food defence and bioterrorism (section 4.15 Iso22002-4).

On behalf of O-I Netherlands B.V., Plant Maastricht

Date: 27-01-2022

Name: Naud Colen – Customer Quality Account Manager Maastricht

Signature:

Naud Colen
27/01/2022



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