

CROWN Technology

Downsview Road

Wantage

Oxfordshire

OX12 9BP

United Kingdom

Tel: +44 1235 772929

Fax: +44 1235 772020

This document supersedes all previous versions

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Food Contact Compliance of CROWN Closures Europe Products¹

All metal vacuum closures supplied by Crown Food and Closures Europe comply with the appropriate EU and USA FDA legislation with respect to food contact materials and articles currently in force including:

- EU Regulation (EC) No. 1935/2004 relating to materials and articles intended to come into contact with food
- EU Regulation (EC) No. 2023/2006 regarding Good Manufacturing Practice
- Where relevant, EU Regulation (EC) No. 1895/2005 relating to the use of certain epoxy derivatives in materials and articles intended to come into contact with food
- Although EU Regulation (EU) 10/2011 (the “Plastics” Regulation) specifically *does not* relate to coatings on metal packaging, closures supplied by CROWN Food Europe readily comply with the restriction placed on Bisphenol A of 0.6mg/6dm² in that measure. **Note:** the internal coating system of closures covered by this Declaration contain resins made using Bisphenol A
- EU Directive 78/142/EEC relating to materials and articles which contain vinyl chloride monomer and which are intended to come into contact with food. **Note:** both the sealing gasket and the internal coating system include PVC in their composition in full compliance with Directive 78/142/EEC. Residual VCM in the gasket and coating and VCM migration into food are below the respective regulatory limits
- With respect to the Sealing Gasket only, EU regulation (EC) No. 10/2011 and amendments, respecting the transitional arrangements and implementation dates in that measure
- The sealing gaskets are formulated in accordance with US FDA 21CFR 177.1210 (Closures with sealing gaskets for food containers), and satisfy the overall migration requirements in this regulation
- All internal coatings are formulated in accordance with US FDA 21CFR 175.300 (Resinous and polymeric coatings), and satisfy the overall migration requirements in this regulation

¹ NOTE – This statement is valid for closures produced by CROWN Closures Europe using coatings based on Bisphenol A.

However, it is important to note that:

- currently, packaging including closures intended for foods specifically marketed for 0-3 year olds in Denmark, Sweden, Belgium and France must comply with specific national legislation regarding Bisphenol A (BPA), and BPA-NI closures should be used
- from 1st January 2015, in France, packaging including closures for all foodstuffs must comply with specific French legislation regarding Bisphenol A (BPA), and BPA-NI closures should be used
- a specific Compliance document is available for BPA-NI closures

Furthermore

- Internal protective coatings on metal closures are not currently in the scope of material specific EU legislation, however they comply with the requirements of the council of Europe Resolution AP(2004)1 and the CEPE European Coatings Code of Practice
- All external coatings and decoration are specified and formulated specifically for use on the non-food contact surface of food packaging in conformance with the EuPIA Guidelines, and are applied under good manufacturing practice such that compliance of the finished closures with Regulation (EC) 1935/2004 is not compromised
- The tinfoil used to make these closures complies with the requirements of European Standard EN10333
- Phthalate ester plasticisers are not used by Crown Food and Closures Europe
- Application and customer specific Declarations of Compliance are available from Crown Food and Closures Europe which indicate the jar sizes for which migration compliance² should be achievable although actual migration into food must be checked by the closure user

Validity: This DoC will remain valid until December 2021 unless it is replaced by a later version taking account of changes in materials, processes, or changes in legislation

NB: *Our certification of conformity to regulations concerning overall or specific migration is based on the use of recognised simulants. Actual migration levels of materials from the closure into food are dependent on the composition of the food product, the method of processing the food in the jar, and the storage conditions in which it is held. It is the packer's responsibility to ensure that migration levels remain within permitted limits, and to carry out any necessary testing to establish this, since CROWN Closures Europe has no control over the actual conditions of use, or of the composition, processing and storage conditions of the final product.*



Richard Whitaker
Manager: Regulatory Affairs
Crown Technologies

² Migration into food is dependent on several factors including the composition of the food, method of processing and storage conditions as well as closure size to jar volume ratio. Crown Closures can indicate the range of suitable jar sizes for different closures based on testing with recognised simulants in accordance with Directive 82/711/EEC and amendments