

Title: DECLARATION OF COMPLIANCE REGARDING MIGRATION
EC - RDL 50

DECLARATION

WE DECLARE THAT

Internal drum lining RDL[®] 50 is in accordance with the requirements as set in the below mentioned Regulations and Directives on Food Contact and therefore the cured lining is allowed to be used as an internal coating for steel drums in the food industry.

1° Intended Food Contact

Internal lining RDL[®] 50 can be used for aqueous, acidic, alcoholic and fatty foods as far as migration levels are concerned. Please note however that the selection of the appropriate packaging for a specific content and specific use is and remains the responsibility of the customer/filler or consignor.

Use of packagings coated with RDL[®] 50 has to be according to OM2 as mentioned in EC 10/2011 meaning **long term storage at room temperature including heating up to 70 degrees Celsius for 2 hours.**

2° Legal Compliance

a) Europe

We confirm that the internal lining RDL[®] 50 complies with the relevant articles of EC 1935/2004 (framework regulation).

i - Overall migration

Migration tests have been performed on the internal lining RDL[®] 50 based on the methods given in EC 10/2011. They have been found to comply with the OML and SML values given in that legislation.

Simulants used were: 3% acetic acid, 50 % ethanol and isooctane (Isooctane was used in stead of olive oil as the migration test with olive oil was not possible due to matrix interference) results were less than 2 mg/dm².

The evaluation of the OML and SML has been done under the assumption that **1 kg of food** is in contact with **6 dm² of packaging material** (in practice this ration will be close to 1:1).

ii - Specific migration

Specific migrations have been determined for formaldehyde, bisphenol A, Epichlorohydrin, BADGE, BADGE.H₂O, BADGE.2H₂O, BADGE.HCL.H₂O, BADGE.HCL, BADGE.2HCL and 2 starting materials that are considered confidential by our raw material suppliers, but are known to the laboratory that performed the migration testing.

List of monomers/additives having a restriction (in current Directives as amended by date):

Name of Monomer/Additive	CAS N°	Restriction, e.g. SML*
Formaldehyde	50-00-0	15 mg/kg
Bisphenol A	80-05-7	0,6 mg/kg
Epichlorohydrin	106-89-8	1 mg/kg
BADGE, BADGE.H ₂ O, BADGE.2H ₂ O		9 mg/kg
BADGE.HCL.H ₂ O, BADGE.HCL, BADGE.2HCL		1 mg/kg

*Specific migration limit

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iii - Additives having multiple functions

No dual use additives have been used in this lining.

b) FDA

Internal lining RDL® 50 complies with the requirements under 21 CFR 175.300 of Food and Drug Administration (FDA). The extraction in distilled water, 8% ethanol and n-heptane has been determined according to the 21 CFR 175.300 regulation.

c) Other national/supranational regulation

All starting substances are permitted for use in coatings according to the CEPE Code of Practice.

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