

Statement on Conformance

PPG7407-310/A Internal liner for aerosol cans 7407 P, gold

Intended use: Internal spray application of extruded aerosol cans made of aluminium. Suitable for cosmetic and pharmaceutical products and as food contact surface.

Assessment:

- **EU: Regulation (EC) No. 1935/2004**

The **European Union Regulation (EC) No. 1935/2004** "concerns materials and articles intended to come into contact with food" and repeals **Directive 80/590/EEC** and **Directive 89/109/EEC**.

If applied and cured for the intended end-use following our recommendations of our datasheets, we hereby confirm, that the product PPG7407-310/A will comply with the requirements set out in **Article 3 of Regulation (EC) No. 1935/2004**. Namely that the above mentioned product is sufficiently inert to preclude substances from being transferred to food in quantities large enough to endanger human health, or bring about an unacceptable change in the composition of the food, or a deterioration in its organoleptic properties.

The physiological harmlessness was confirmed by the examinations with respect to food legislation, which has been carried out in accordance with the Council Directive 85/572/EEC of 19 December 1985, Commission Directive 97/48/EU of 29 July 1997 and the German adoption of the above mentioned requirements into ASU-method B 80.30 (1+2) (official collection of analytical methods according to German Code of Law for Food and Feeds **LFGB § 64** (the LFGB has repealed the German Food and Commodities Law LMBG as valid national law on September 1, 2005)) as well as the **US FDA Code of Federal Regulations Title 21, Subpart 175.300 "Resinous and polymeric coatings"** (Institute Nehring, Braunschweig, Germany, Reference-No. STGM19-076 (9053402) (EN), dated 2006-07-13).

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The dry residues of the migrates are low and below the levels which are considered as tolerable in the **Resolution ResAP(2004)1**. They are also considerable lower than those levels which are mentioned in **US FDA Regulation 21 CFR § 175.300 "Resinous and polymeric coatings"**.

The product is listed by the **FDA** (Food and Drug Administration) in Washington under the **Drug Master File number DMF 6612 Type III Packaging Material**.

- **Germany: LFGB**

In the circumstances of the destined and expected usage the product PPG7407-310/A complies with the requirements of the **§ 31 paragraph 1 of the LFGB** and is eligible for the manufacture of commodities as defined by § 5 paragraph 1 No. 1. The LFGB (German Code of Law for Food and Feeds) has repealed the LMBG (German Food and Commodities Law) as valid national law on September 1, 2005.

- **EU: Commission Directive 2002/72/EC**

The product PPG7407-310/A meets the compositional requirements of the Commission Directive 2002/72/EC, relating to plastic materials and articles intended to come into contact with foodstuffs, latest amendment Commission Directive 2005/79/EC.

- **EU: Commission Regulation (EC) No. 1895/2005**

To avoid risks to human health the **Commission Regulation (EC) No. 1895/2005** lays down specific migration limits for **BADGE** (Bisphenol-A DiGlycidyl Ether), **BFDGE** (Bisphenol-F DiGlycidyl Ether) as well as for **NOGE** (novolac glycidyl ethers) and some of their derivatives.

The level of migrating species from a lacquer is among other things dependant upon the application and curing conditions over which we, PPG Industries / **HOBA** Lacke und Farben GmbH, have no control. However when applied and cured following the recommendations on our data sheets the product PPG7407-310/A will give levels of migrating species well within the limits set by the Commission Regulation (EC) No. 1895/2005. Consequently we claim the non volatile components of the above mentioned product to meet the compositional requirements of the 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" (Institute Nehring, Braunschweig, Germany, Reference-No. STGM21-066 (9053402) (EN), dated 2006-06-28).

Furthermore we hereby declare, that in the manufacture of the above mentioned product no **Novolac resin** is used. Further, none of the constituent raw materials is specified by its supplier to contain **Novolac** as an impurity.

- **EU: Directive 2004/1/EC – Use of Azodicarbonamide (ADC), Semicarbazide (SEM)**

We hereby declare, that the product PPG7407-310/A is free of **Azodicarbonamide** and therewith free of **Semicarbazide**. Further, none of the constituent raw materials is specified by its supplier to contain Azodicarbonamide or Semicarbazide as an impurity. Thus the above mentioned product meets the compositional requirements of the Commission Directive 2004/1/EC of 6 January 2004, amending Directive 2002/72/EC as regards the suspension of the use of azodicarbonamide as blowing agent.

- **Ethylene Glycols**

We hereby declare, that the product PPG7407-310/A is free of **Ethylene Glycols**, in particular also free of **Ethylene glycol methyl ether (EGME, CAS-Nr. 109-86-4)**, **Ethylene glycol ethyl ether (EGEE, CAS-Nr. 110-80-5)**, **Ethylene glycol methyl ether acetate (EGMEA, CAS-Nr. 110-49-6)**, **Ethylene glycol ethyl ether acetate (EGEEA, CAS-Nr. 111-15-9)**, **Ethylene glycol dimethyl ether (EGDME, CAS-Nr. 110-71-4)** and **Triethylene glycol dimethyl ether (TEGDME, CAS-Nr. 112-49-2)**. Further, none of the constituent raw materials is specified by its supplier to contain any of the above mentioned ethylene glycols as an impurity.

- **Latex**

We hereby declare, that in the manufacture of the product PPG7407-310/A no **Natural Rubber Latex** or any material known to contain it is used. Further, none of the constituent raw materials is specified by its supplier to contain Natural Rubber Latex as an impurity.

- **Organotin compounds**

We hereby declare, that the product PPG7407-310/A is free of **Organotin compounds** such as **Monobutyltin (MBT)**, **Dibutyltin (DBT)** and **Tributyltin (TBT)**. Further, none of the constituent raw materials is specified by its supplier to contain any of the above mentioned substances as an impurity.

- **Phthalates**

We hereby declare, that the product PPG7407-310/A is free of **Phthalates**, in particular also free of **Dibutylphthalate (DBP)**, **Diethylphthalate (DEP)**, **Diisononyl phthalate (DINP)**, **Diethylhexylphthalate (DEHP)**, **Di-isodecylphthalate (DIDP)**, **Di-n-octylphthalate (DNOP)** and **Benzylbutylphthalate (BBP)**. Further, none of the constituent raw materials is specified by its supplier to contain phthalates as an impurity.

- **Polybrominated biphenyls (PBB), polybrominated diphenyl ether (PBDE), polychlorinated biphenyls (PCB)**

We hereby declare, that the product PPG7407-310/A is free of **polybrominated biphenyls (PBB)**, **polybrominated diphenyl ether (PBDE)** and **polychlorinated biphenyls (PCB)**. Further, none of the constituent raw materials is specified by its supplier to contain PBB, PBDE or PCB as an impurity.

- **Polyvinyl chloride (PVC), Polyvinylidene chloride (PVDC)**

We hereby declare, that in the manufacture of the product PPG7407-310/A no **Polyvinyl chloride (PVC)** or **Polyvinylidene chloride (PVDC)** or any material known to contain it is used. Further, none of the constituent raw materials is specified by its supplier to contain Polyvinyl chloride or Polyvinylidene chloride as an impurity.

- **BSE (Bovine Spongiform Enzephalopathy) / TSE (Transmissible Spongiform Enzephalopathy)**

We hereby declare that for the product PPG7407-310/A no deliberate or knowing addition of raw materials of animal origin is made in its manufacture. Further, none of the raw materials purchased for the production of PPG7407-310/A are specified by its supplier to contain any substances of animal origin as significant impurities.

Therefore it can be precluded, that the product contains any substances, that cause **bovine spongiform encephalopathy (BSE)**, that belongs to a group of diseases known as **transmissible spongiform encephalopathies (TSE)**.

- **EU/USA: Directive 94/62/EC, CONEG**

We hereby declare, that in the manufacture of PPG7407-310/A no deliberate or knowing addition of **toxic metals** or **heavy metals**, specifically lead, cadmium, mercury and chrome (VI), is made and the product does therefore constitutionally not contain any **heavy metals**. Furthermore, none of the raw materials purchased for the production of the above named product is specified by its supplier to contain any toxic metals or heavy metals as significant impurities.

The total content of all elements combined is in summary less than 100 ppm by weight and thus complies with the limit specified by the **European Council and Parliament Directive on Packaging and Packaging Waste 94/62/EC** (December 1994) as well as the **American CONEG Regulation** (January 1994).

- **Use of halogenated hydrocarbons**

Halogenated hydrocarbons are generally not used in the manufacture of our products.

References

- **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 food and repealing Directives 80/590/EEC and 89/109/EEC
- **Framework Resolution ResAP(2004)1** on coatings intended to come into contact with Foodstuffs of 10 June 2004, adopted by the Committee of Ministers on 1 December 2004
- **US FDA 21 CFR § 175.300** „Resinous and polymeric coatings“
- **LFGB** - German Code of Law for Food and Feeds (repealed the LMBG (German Food and Commodities Law) as valid national law on September 1, 2005)

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Commission Directive 2002/72/EC of 6 August 2002 relating to plastic materials and articles intended to come into contact with foodstuffs

- **Regulation (EC) Nr. 1895/2005** of the European Parliament and of the Council of 18 November 2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food
- **Commission Directive 2004/1/EC** of 6 January 2004, amending Directive 2002/72/EC as regards the suspension of the use of azodicarbonamide as blowing agent.
- **CONEG**, issued January 1994
- **Directive 94/62/EC** of the European Parliament and of the Council on packaging and packaging waste of December 1994

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• **Validity**

This assessment refers exclusively to the product **PPG7407-310/A**. In the case of a change of the raw materials, the raw material composition of the product, the legal regulations or new toxicological realizations it loses its validity.

5 of 5

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