



DECLARATION OF COMPLIANCE

We declare that our products: Aluminium household foil (uncoated) , named as: Alu refill, Alu box ; art. range: 3xx-xx & 6xx-xx (where x stands for a specific art. nr) comply with:

- Framework regulation (EC) No. 1935/2004, on materials and articles intended to come into contact with food
- Commission regulation (EC) No 2023/2006, on good manufacturing practice for materials and articles to come into contact with food
- French arrete of 27 august 1987, related to materials and objects in aluminium and aluminium alloys in contact with food, products and drinks
- Italian decree of 18 april 2007, No.76 regulations concerning the hygiene of materials and articles of aluminium and aluminium alloys intended to come in contact with food
- BS EN 602:2004, standard about aluminium and aluminium alloys- wrought products- chemical composition of semi finished products used for the fabrication of articles for use in contact with foodstuff
- US food and drug administration FDA CFR title 21 § 172.830, §172.884, §178.3620(b), §178.3650(a), §178.3910 (a) en (b)
- Turkish food codex regulation on materials and articles which are intended to come into contact with foodstuffs revised April 5th, 2018 item (g) of Annex IV
- Directive 2004/12/EC, amending 94/62/EC
- Reach (EC) No. 1907/2006

Test conditions:

Compliance has been checked according to EDQM- Metals and Alloys used in food contact materials and articles CE (2013) – A practical guide for manufacturers and regulators.

According to EDQM technical guide and Annex VI of Turkish food codex regulation on materials and articles which are intended to come into contact with foodstuffs, revised April 5th,2018 specific release limit (SRL) for aluminium is: 5 mg/kg food

Material was tested using artificial tap water-DIN 10531 for 2 hours at 100°C and 10 days at 40°C.
Tests were conducted with surface/volume ratio: 1,11 dm²/100 ml.
Specific release of Al (SR) found below 5 mg/kg, see test report.



Recommendations of usage:

It is not possible to specify food groups or food types in which our uncoated aluminium foil is suitable, therefore we give you below our recommendation of use.

Uncoated aluminium foil/articles are not suitable for storing or processing of acidic (pH<4.5), alkaline (>8.5) or salty (>3.5% NaCl) foodstuffs for extended time periods.

In addition, surface / volume ratio of the oscillation tests we have conducted for compliance with Article 8 is 1,11dm² / 100ml and this result is included in the current test report.

In general: storage of acidic, alkaline or salty products in direct contact with uncoated aluminium foil should be avoided at all time.

In aqueous environment these products can dissolve aluminium, the extent of which would depend on temperature and contact time.

Compliance with specific release limits should be measured from the final application intended to come into contact with food by using real food or appropriate food simulants at the intended and foreseeable conditions.

It is the responsibility from the end user to verify before usage that the final application complies with the requirements as set out by the applicable legislation.



Statement regarding aluminium foil raw material

Packaging & Packaging waste

Directive 2004/12/EC

Amending 94/62/EC

Reference: Aluminium household foil uncoated

We declare that in the above mentioned products:

- Lead, Mercury, Cadmium and hexavalent Chromium* are not voluntary added and the total incidental concentration of these four heavy elements doesn't exceed 100 ppm,
*Hexavalent chromium does not exist in metallic aluminium
- Substances dangerous to the environment, as so classified with the symbol "N" in the Directive 67/548/EC (and its amendments) are not intentionally introduced in the manufacturing by us or by use of materials from our pre-suppliers.

We also inform that the above mentioned packaging materials is recoverable:

- In the form of energy recovery for foil with thickness below 50 micron; with an official calorific gain of 25MJ/kg (norm EN 13431),
- By Material recycling (norm EN 13430)



REACH Compliance Declaration

Compliance with regulation (EC) No 1907/2006 of the European Parlement concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) was first released.

This regulation establishes specific duties and obligations for companies in the European union (EU) that manufacture or import substances on their won, in preparations or in articles.

We are aware of the new obligations imposed by REACH and we have been working on this for since we have learned, together with our suppliers.

We assure you that none of our products contain SVHC substances which are currently in the Candidate List of ECHA: <https://echa.europa.eu/candidate-list-table>

We and our suppliers are operating in accordance with the REACH legislation and the updates from the ECHA website or related coordinators within our country.

We are also aware if our continuing obligations with regard to the dangerous substances restricted under the marketing & use directive, which continue to be restricted as described in Annex XVII of REACH.

In case of any change from our products in relation to REACH we will inform you immediately.



TEST REPORT

10 DAYS AT 40°C

Test material: Aluminium household foil uncoated




TEST REPORT Job No./Report No TR1396183

Test Parameters	Result
Chemical tests	A1
Specific Release of 20 Metals in Metal Article	M
Remarks	: M = Meets client's requirement F = Below client's requirement I = Inconclusive * = No specified requirement # = For 2-composite mix with results exceeding one half of the relevant requirements or 3-composite mix with results exceeding one third of the relevant requirements, the composite sample may have the possibility of one or more components that can lead to a failure result, therefore, it is recommended to test on individual basis.
Notes:	Conclusions on meet/fail are based on the test result from the actual sampling of the received sample(s). The composite sampling method is based on the client's special request and is a modification from the testing standard. Residual sample can be returned to client if requested.

The test results relate to the tested items only.
Test reports without SGS seal and authorized signatures are invalid.
Reported results do not include uncertainties.

Issued in Istanbul
Signed for and on behalf of
SGS Supervise Gözetme Etüd Kontrol Servisleri A.Ş.

Selen Harman
Customer Services Team Leader

Yağız Barın
Section Manager








TEST REPORT Job No./Report No TR1396183

Specific Release of Metals in Metal Article¹

Test Method: SGS In House Test Method RSTS-CHEM-603-1 (with reference to EN13130-1:2004), Analysis was performed by ICP-MS.

Test Conditions: 10 days at 40 °C (1st Migration)

Simulant Used: Artificial tap water

	<u>Result(s)</u> <u>(mg/kg)</u>	<u>Reporting Limit</u> <u>(mg/kg)</u>	<u>SRL</u> <u>(mg/kg)</u>
	A1		
Antimony (Sb)	n.d.	0,02	0,04
Arsenic (As)	n.d.	0,001	0,002
Barium (Ba)	n.d.	0,25	1,2
Beryllium (Be)	n.d.	0,005	0,01
Cadmium (Cd)	n.d.	0,002	0,005
Chromium (Cr)	n.d.	0,1	0,25
Cobalt (Co)	n.d.	0,01	0,02
Copper (Cu)	n.d.	0,1	4
Lead (Pb)	n.d.	0,005	0,01
Lithium (Li)	n.d.	0,02	0,048
Iron (Fe)	n.d.	0,25	40
Manganese (Mn)	n.d.	0,25	1,8
Mercury (Hg)	n.d.	0,002	0,003
Molybdenum (Mo)	n.d.	0,02	0,12
Nickel (Ni)	n.d.	0,05	0,14
Silver (Ag)	n.d.	0,03	0,08
Thallium (Tl)	n.d.	0,0001	0,0001
Tin (Sn)	n.d.	5	100
Vanadium (V)	n.d.	0,005	0,01
Zinc (Zn)	n.d.	1	5

Conclusion **Pass**

Note(s): n.d.= not detected

°C = degree Celsius

mg/kg = milligram per kilogram of foodstuff in contact with

mg/dm² = milligram per square decimeter of foodstuff in contact with

- Remark(s)=**
1. Test condition & simulant were specified according to EN 13130-1,
 2. The ratio of surface area to volume ratio is 1,11 dm² per 0,1 L of foodstuff in contact with,
 3. The volume of simulant used is 0,1 L




TEST REPORT Job No./Report NoTR1395299

Test Parameters	Result
Chemical tests	A1
Specific Release of Aluminium in Metal Article	M

Remarks	: M = Meets client's requirement F = Below client's requirement I = Inconclusive * = No specified requirement # = For 2-composite mix with results exceeding one half of the relevant requirements or 3-composite mix with results exceeding one third of the relevant requirements, the composite sample may have the possibility of one or more components that can lead to a failure result, therefore, it is recommended to test on individual basis.
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Notes:	Conclusions on meet/fail are based on the test result from the actual sampling of the received sample(s). The composite sampling method is based on the client's special request and is a modification from the testing standard. Residual sample can be returned to client if requested.
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The test results relate to the tested items only.
Test reports without SGS seal and authorized signatures are invalid.
Reported results do not include uncertainties.

Issued in Istanbul
Signed for and on behalf of
SGS Supervise Gözetme Etüd Kontrol Servisleri A.Ş.

Selen Harman
Customer Services Team Leader

Yağız Barın
Section Manager



Specific Release of Aluminium in Metal Article (EU)¹

Test Method: SGS In House Test Method RSTS-CHEM-603-1 (with reference to EN13130-1:2004). Analysis was performed by ICP-MS.

Test Conditions: 10 days at 40 °C (1st Migration)

Simulant Used: Artificial tap water

	<u>Result(s)</u> <u>(mg/kg)</u>	<u>Reporting Limit</u> <u>(mg/kg)</u>	<u>Max Limit</u> <u>(mg/kg)</u>
Aluminium (Al)	A1 n.d.	0,2	5
Conclusion	Pass		

Note(s): n.d.= not detected
°C = degree Celsius

mg/kg = milligram per kilogram of foodstuff in contact with

mg/dm² = milligram per square decimeter of foodstuff in contact with

Remark(s)=
1. Test condition & simulant were specified according to EN 13130-1,
2. The ratio of surface area to volume ratio is 1,11 dm² per 0,1 L of foodstuff in contact with,
3. The volume of simulant used is 0,1 L



TEST REPORT

2 hours at 100°C

Test material: Aluminium household foil uncoated




TEST REPORT Job No./Report No TR1395276

Test Parameters	Result
Chemical tests	A1
Specific Release of 22 Metals in Metal Article	M

Remarks	:	M = Meets client's requirement F = Below client's requirement I = Inconclusive * = No specified requirement # = For 2-composite mix with results exceeding one half of the relevant requirements or 3-composite mix with results exceeding one third of the relevant requirements, the composite sample may have the possibility of one or more components that can lead to a failure result, therefore, it is recommended to test on individual basis.
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Notes:	Conclusions on meet/fail are based on the test result from the actual sampling of the received sample(s). The composite sampling method is based on the client's special request and is a modification from the testing standard. Residual sample can be returned to client if requested.
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The test results relate to the tested items only.
Test reports without SGS seal and authorized signatures are invalid.
Reported results do not include uncertainties.

Issued in Istanbul
Signed for and on behalf of
SGS Supervise Gözetme Etüd Kontrol Servisleri A.Ş.

Selen Harman
Customer Services Team Leader

Yağız Barın
Section Manager








TEST REPORT Job No./Report NoTR1395276

Specific Release of Metals in Metal Article¹

Test Method: SGS In House Test Method RSTS-CHEM-603-1 (with reference to EN13130-1:2004). Analysis was performed by ICP-MS.

Test Conditions: 2 hours 100 °C (1st Migration)

Simulant Used: Artificial tap water

	Result(s) (mg/kg)	Reporting Limit (mg/kg)	SRL (mg/kg)
	A1		
Antimony (Sb)	n.d.	0,02	0,04
Arsenic (As)	n.d.	0,001	0,002
Barium (Ba)	n.d.	0,25	1,2
Beryllium (Be)	n.d.	0,005	0,01
Cadmium (Cd)	n.d.	0,002	0,005
Chromium (Cr)	n.d.	0,1	0,25
Cobalt (Co)	n.d.	0,01	0,02
Copper (Cu)	n.d.	0,1	4
Lead (Pb)	n.d.	0,005	0,01
Lithium (Li)	n.d.	0,02	0,048
Iron (Fe)	n.d.	0,25	40
Manganese (Mn)	n.d.	0,25	1,8
Mercury (Hg)	n.d.	0,002	0,003
Molybdenum (Mo)	n.d.	0,02	0,12
Nickel (Ni)	n.d.	0,05	0,14
Silver (Ag)	n.d.	0,03	0,08
Thallium (Tl)	n.d.	0,0001	0,0001
Tin (Sn)	n.d.	5	100
Vanadium (V)	n.d.	0,005	0,01
Zinc (Zn)	n.d.	1	5
Magnesium (Mg)	n.d.	1	-
Titanium (Ti)	n.d.	1	-
Conclusion	Pass		

Note(s): n.d.= not detected

°C = degree Celsius

mg/kg = milligram per kilogram of foodstuff in contact with

mg/dm² = milligram per square decimeter of foodstuff in contact with

- Remark(s)=**
1. Test condition & simulant were specified according to EN 13130-1,
 2. The ratio of surface area to volume ratio is 1,11 dm² per 0,1 L of foodstuff in contact with,
 3. The volume of simulant used is 0,1 L




TEST REPORT Job No./Report No TR1395310

Test Parameters	Result
Chemical tests	A1
Specific Release of Aluminium in Metal Article	M

Remarks	:	M = Meets client's requirement
		F = Below client's requirement
		I = Inconclusive
		* = No specified requirement

Notes:	Conclusions on meet/fail are based on the test result from the actual sampling of the received sample(s).
	Residual sample can be returned to client if requested.

The test results relate to the tested items only.
 Test reports without SGS seal and authorised signatures are invalid.
 Reported results do not include uncertainties.

Issued in Istanbul
 Signed for and on behalf of
 SGS Supervise Gözetme Etüd Kontrol Servisleri A.Ş.

Selen Harman
 Customer Services Team Leader

Yağız Barın
 Section Manager



Specific Release of Aluminium in Metal Article (EU)*

Test Method: SGS In House Test Method RSTS-CHEM-603-1 (with reference to EN13130-1:2004). Analysis was performed by ICP-MS.

Test Conditions: 2 hours 100 °C (1st Migration)

Simulant Used: Artificial tap water

	<u>Result(s)</u> <u>(mg/kg)</u>	<u>Reporting Limit</u> <u>(mg/kg)</u>	<u>Max Limit</u> <u>(mg/kg)</u>
Aluminium (Al)	A1 n.d.	0,2	5
Conclusion	Pass		

Note(s): n.d. = not detected
 °C = degree Celsius

mg/kg = milligram per kilogram of foodstuff in contact with

mg/dm² = milligram per square decimeter of foodstuff in contact with

Remark(s)=

1. Test condition & simulant were specified according to EN 13130-1,
2. The ratio of surface area to volume ratio is 1,11 dm² per 0,1 L of foodstuff in contact with,
3. The volume of simulant used is 0,1 L