

## DECLARATION OF COMPLIANCE

<i>Date:</i>	2026-01-30
<i>Manufacturer:</i>	GPI Tibro AB
<i>Address:</i>	Grönhultsvägen 11 543 51 Tibro SWEDEN
<i>Product:</i>	Alu Tray – Aludium Aluminium alloy 8006
<i>Material:</i>	The information given in this Declaration of Compliance is based on written confirmations of our suppliers, certificate No AL-08/2026. The aluminium foil used are intended for packaging of food. Storage of strongly acidic, alkaline or salty, liquids products in direct contact with <u>uncoated</u> aluminium foil should be avoided. In aqueous environment these products can dissolve aluminium, the extent of which would depend on temperature and contact time. The suitability of uncoated aluminium foil for specific applications should be ascertained by the packer of the food. It is also the responsibility of the packer of the food to determine that the products are lawful for use in the intended application and market.
<i>Regulations:</i>	We certify that this product fulfils the requirements on product intended for use in contact with food as described in:
<i>Aluminium foil with lubricant:</i>	Regulation (EU) No 1935/2004 Regulation (EU) No 2023/2006 European Directive 94/62/CE, Heavy Metals content and subsequent amendments Regulation (EC) 2025/40, article 5.4 and 5.5 European Standard EN 602 “Aluminium and aluminium alloys – Wrought Products – Chemical composition of semi products used for the fabrication of articles for use in contact with food”. European standard EN 573-3 “Aluminium and aluminium alloys – Chemical composition and form of wrought products – Part 3: Chemical composition”. European standard EN 14287 “Aluminium and aluminium alloys – Specific requirements on the chemical composition of products intended to be used for the manufacture of packaging and packaging components. Lubricants in use are in compliance with FDA as included in the paragraph c-3, section 178.3620, title 21 of the Code of Federal Regulations.
<i>Trayforming:</i>	We certify that the product has been manufactured in accordance with Commission Regulation No 2023/2006 on Good Manufacturing Practice and in a hygiene standard management system. We are certified according to BRC Packaging, Issue 6, grade achieved: AA+ (unannounced).

*End use:*

The product is intended to be used for food packaging. Recommended use of temperature: 300°C in 0,5 hour or 180°C in 1 hour. If the product is intended to be used under other conditions it is the responsibility of the packer food to perform tests to assure compliance. The suitability of uncoated aluminium foil for specific applications should be ascertained by the packer. Using of real food and actual foreseeable testing conditions is preferred to using food simulants.

*Migration analysis:*

A Specific migration analysis on aluminium foil has been performed by the supplier of the aluminium foil with approved result.

Simulant	Contact time	Temperature (°C)
Artificial tap water	2 hours	100 °C
Artificial tap water	2 hours	70 °C + 24h at 40 °C
Artificial tap water	10 days	40 °C
10 % Ethanol and Simulant A	2 hours	70 °C
10 % Ethanol and Simulant A	4 hours	70 °C (tbc)
10 % Ethanol and Simulant A	2 hours	100 °C
10 % Ethanol and Simulant A	10 days	20 °C
Vegetable oil	0,5 hour	300 °C
Vegetable oil	1 hour	180 °C
Vegetable oil	10 days	20 °C

*Aluminium release:*

The supplier declares that the products fulfils with SRL for Aluminium recommended in CM/Res(2013)9 and EDQM 2nd Edition of 2024 attending to the tests performed at labs over plain/flat rolled material.

*NIAS:*

The supplier of the aluminium foil declares that in the manufacturing of the aluminium alloy the following substances are not intentionally used nor added as main component/raw material (Cut-Off threshold < 1% w/w) in any step of the manufacturing process:

- Vinyl chloride monomer (CAS 75-01-4), SML n.d. and QM 1 mg/kg material
- Isocyanates Isocyanate containing substances or substances manufactured using isocyanates (e.g. polyurethanes), SML = N.D., QM = 1 mg/kg material
- Primary Aromatic Amines (PAAs). the specific limit for the migration of PAAs (SML = not detectable) will be met upon delivery.
- Bisphenol A (BPA) and any other Bisphenols (e.g. substances that contain BPA as residual monomer
- BFDGE, BADGE, NOGE, BADGE-Diacrylate, alkoxyated Bisphenol A, Cyclo-Di-BADGE, BPS, etc. as set out in Regulation (EU) 2024/3190
- MOSH (C20-C35) and MOAH (C16-C35) as defined in the German Ordinance of Mineral Oils
- PFAS per- or polyfluorinated substances (any chemical with at least a perfluorinated methyl group (-CF3) or a perfluorinated

methylene group (–CF<sub>2</sub>–) is a PFAS, including fluoropolymers in their function as additive or processing aid

- ortho-Phthalates as plasticizer or as part of a catalytic system
- Biocides listed in the Biocidal Products Regulation (EU) 528/2012.
- Epoxy-silanes as adhesion promoters in adhesives or inks / lacquers
- Substances listed in Regulation (EU) No 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs Regulation)
- Dangerous Substances and endocrine disruptors according to the The French Law on Anti-Waste and Circular Economy Loi n° 2020-105 as set out in the Order of 30 August 2023 and of 28 September 2023
- Arsenic is not added intentionally. Arsenic is measured statistically in selected samples by XRF being in all cases <0.0001 %

<i>Allergens:</i>	The supplier of the aluminium foil declares that in the manufacturing of the aluminium alloy, allergens as indicated in Annex II of Regulation (EU) No 1169/2011 are not intentionally used nor added as main component/raw material (Cut-off threshold <1% w/w).
<i>GMO:</i>	In the manufacturing of the aluminium alloy GMO are not intentionally used nor added as main component/raw material (Cut-off threshold <1% w/w).
<i>REACH</i>	We herewith confirm that we are aware of the REACH Regulation and our obligations in REACH are as a downstream user. Our suppliers have registered and will do the registration according to the timelines set in the REACH registration. If any of the articles will be on the list of “Substances of Very High Concern” (SVHC) our supplier will inform us according to article 33 REACH legislation.
<i>Recommended storage:</i>	Long term storage of non filled products at 10-20°C, in an atmosphere as dry as possible. We recommend consumption within 12 months from delivery date and after this time rights of claims disappear.
<i>Transport packaging:</i>	According to statements of our suppliers, transport packaging (e.g. corrugated boxes) are made in accordance with generally accepted engineering. All raw materials comply with the laws in force and are therefore suitable for food packaging. However please note, used transport packaging is partly made from recycled components and varieties. Therefore it could not exclude a migration from evaluated and unevaluated substances without the use of appropriate barrier layers. Therefore we recommend using plastic bags when packing in corrugated boxes, which is our normal way of packing our finished products.
<i>Waste handling:</i>	The aluminium material is in compliance with the Packaging and Packaging Waste directive 94/62/EC. The aluminium is suitable for recovery by material recycling (EN 13430).

*Labelling:*

It should be noted that FCM and articles made from aluminium coming into contact with food must comply with the following additional recommendations:

- Contact with acidic (e.g. fruit juices), alkaline (e.g. lye dough products) or salty, liquid foodstuffs in uncoated aluminium utensils should be avoided in order to minimise release.
- With regard to retail packs, the suppliers must ensure that these are labelled with appropriate information for the end consumer. The labelling should include the icon shown below (or equivalent)



and the following statement: DO NOT USE WITH: ACIDIC FOOD (e.g. peeled fruit, tomatoes, pickles, salad dressing) – SALTY FOOD (e.g. pretzels, white herring, cured meats)

*Microwave oven:*

When using Foil Containers (finished product) in use for microwave ovens, our supplier agree on many studies conducted indicating the use of aluminium foil packaging materials in microwave ovens is safe when their general instructions for use are observed. In any case, the actual suitability for microwaving use must be ascertained by the container packer. GPI Tibro is not accountable to any dispute in connection to the use of foil in microwave applications.

*Certificates:*

GPI Tibro AB comply to the below standards and certificates are available on below address.

BRC GS Packaging (Quality and Hygiene standard)

FSC® C012938

PEFC™

<https://www.graphicpkg.com/customer-resources/>

This certificate is valid for two years or until there is a significant change in the material, manufacturing process or in legislation.



**GPI Tibro AB**

Therese Larsson

QHSE Manager

GPI Tibro AB