

FOOD CONTACT DECLARATION

Arconic-Kőfém Mill Products Hungary Kft hereby declares that the produced coils, sheets and circles from the following alloys are in compliance with the legislations concerning materials and goods intended to be used for contact with food.

- EN AW 1050A (1A; 24)
- EN AW 1050A (12)
- EN AW 1200 (06; 1C)
- **0140 (13)**
- EN AW 3003 (33; 3J)
- EN AW 3003+ Fe (3T)
- EN AW 3003+Fe (3V)
- EN AW 3103 (26; 28)
- **0370 (01)**
- **0328 (04)**
- **0331 (32)**
- **0359 (35)**
- **0371 (3A)**
- **0372 (3G)**
- **0333 (3L)**
- **0301 (3W)**
- **0311 (9W)**
- **A4000 (4A) (87)**
- EN AW 4006 (4U; 89)
- EN AW 4147 (99)
- EN AW 5052 (57)
- EN AW 5052 (59)
- EN AW 6061 (48)
- EN AW 8079 (10)

Patented alloy

(xy) internal alloy code

The declaration is based on:

THE EUROPE PARLIAMENT AND COUNCIL REGULATION (EU) no. **1935/2004**: The fundamental principle in this regulation is that the materials and the goods, which are intended for direct or indirect contact with foods, do not give any substance to the foods in amounts that can involve any danger to the human health or cause an unacceptable change of the food composition or a degradation of their organoleptic quality.

REGULATION OF THE COMMISSION (EU) no. **2023/2006**: Good Manufacturing Practices for materials and articles intended to come in contact with food are described. It ensures that food contact materials (like packaging, containers, kitchenware) are safely manufactured so they do not: endanger human health, alter the composition of food, affect taste or smell (organoleptic properties). Applies to all stages of manufacturing, processing, and distribution (except the production of raw materials).

MOCA: Foods are exposed to an infinite number of different materials on a daily basis, and are identified by the term MOCA (Material and Objects in Contact with Food). Any of these materials might be a source of contamination, either by micro-organisms on their surface or by undesirable substances released to the food during contact. These concerns are handled by national and Community legislative and regulatory provisions which, in recent years, have become the reference point with which to deal compulsorily when a producer intends to place on the market a product which, in its normal use, is expected to be in contact with a food.

- art. 3 of Community Regulation **1935/2004**
- European Regulation is **2023/2006/CE**, which states in Article 5

EUROPEAN DIRECTIVE (EU) no. **94/62/CE**: Packaging and Packaging Waste directive. Applies to all packaging placed on the EU market and all packaging waste, regardless of the material used. Sets essential requirements for packaging design, including: minimizing volume and weight, ensuring packaging is reusable, recyclable, or recoverable, establishes targets for the recovery and recycling of packaging waste, limits the use of hazardous substances, such as heavy metals, in packaging, promotes Extended Producer Responsibility (EPR), meaning producers are responsible for the environmental impact of their packaging.

Guidelines on Metals and Alloys used as Food Contact Materials (13/02/2002): are a technical document that provides safety recommendations for materials made of metals and alloys that come into contact with food. These guidelines are not legally binding, but they serve as a reference for national authorities and industry across Europe.

They cover specific metals (e.g. aluminium, chromium, copper, iron, nickel, lead, etc.) and alloys used in food contact materials like: kitchen utensils, food processing equipment, packaging. The document sets specific release limits (SRLs) for each metal — meaning how much of a metal is allowed to migrate into food from the material.

Model Toxics in Packaging Legislation (formerly known as **CONEG** legislation (U.S.)): The Model, and state laws based on the Model, prohibit the intentional use of any amount of four metals – *lead, mercury, cadmium, and hexavalent chromium* in any packaging and packaging component. In addition, the sum of the concentration levels of incidentally introduced lead, mercury, cadmium, and hexavalent chromium present in any package or individual packaging component cannot exceed 100 parts per million by weight.

Toxics in Packaging Clearinghouse Model Legislation 2021 Update, February 16, 2021			
Substance	Scope	Requirement	Effective Date
Lead, cadmium, mercury and chromium (VI)	Package or packaging component	≤ 100 ppm (sum)	February 16, 2021*
Phthalates		≤ 100 ppm (sum)	
PFAS		Prohibited (Not detected)	
*Each state may adopt changes to its existing law or adopt a new law to address toxics in packaging.			

U.S. Food and Drug Administration (FDA): a federal agency responsible for protecting public health by ensuring the safety and quality of food, drugs, and related products. One of the key regulatory frameworks established by the FDA is the **Code of Federal Regulations, Title 21 (21 CFR)**, which sets requirements for substances that may come into contact with food during manufacturing.

Arconic confirm that all oils and lubricants used in our production processes comply with the applicable provisions of 21 CFR, specifically those governing lubricants with incidental food contact. These products are formulated exclusively from substances permitted under 21 CFR and meet all relevant safety standard

This alloys comply and follow the following standards:

EN 573-3: Aluminium and aluminium alloys - Chemical composition and form of wrought products

EN 485-1, EN 485-2, EN 485-3, EN 485-4: Aluminium and aluminium alloys — Sheet, strip and plate - Technical conditions for inspection and delivery; Mechanical properties; Tolerances on dimensions and form for hot-rolled products; Tolerances on shape and dimensions for cold-rolled products

EN 602: Aluminium and aluminum alloys – Wrought products- Chemical composition of semi products used for the fabrication of articles for use in contact with food.

EN 602:2004 (E)

EN 602:2004 (E)

Table 1 — Aluminium — Other elements

Element	Maximum content % (by mass)
Iron + Silicon	1,0
Copper	0,10 (if Cr and / or Mn ≥ 0,05) 0,20 (if Cr < 0,05 and Mn < 0,05)
Other elements ^a each	0,10

^a Other elements are for example, Cr, Mg, Mn, Ni, Zn.

Table 2 — Aluminium alloys — Maximum content of elements

Element	Maximum content % (by mass)
Silicon	13,5
Iron	2,0
Copper	0,6
Manganese	4,0
Magnesium ^a	11,0
Chromium	0,35
Nickel	3,0
Zinc	0,25
Zirconium	0,3
Titanium	0,3
Other elements ^b	0,05 each 0,15 in total

^a Alloys containing more than 5 % magnesium shall not be used for the production of pressure resisting parts in pressure cooking applications.

^b For some alloying elements (e.g. Ag) as mentioned under 'Other elements' the maximum content is limited at 0,05 % because of insufficient knowledge about behaviour in contact with food. Higher limits may be introduced when more information is available.

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Székesfehérvár, 06-11-2025