



Declaration of Compliance

For aluminium food contact articles - Aluminium -
Inside plain/Outside plain

Last updated: 2026-08-21

Valid from: 2026-09-17

1. Issued / Manufactured / Imported by

Plus Pack Group
Odense (DK) / Genk (BE)

2. Identification of the product

Combination of materials (outside to inside)

Lubricant - aluminum foil - lubricant

Product reference(s)

Item number	Product Group	Technical Name
0738110899	Standard alu.containers	RECT.818ML.FULL.CURL

3. Compliance with food contact legislation

This item supplied by Plus Pack is intended to come into contact with the indicated foodstuffs and comply with the following EU Commission regulations and directives under the filling/treatment and storage conditions:

- Framework Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food of 27 October 2004, as amended on the above-mentioned date of last update, in particular articles 3, 15 and 17.
- Directive (EC) 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food with possible amendments.
- Koninklijk besluit van 17 februari 2021 betreffende materialen en voorwerpen van metaal en legering die bestemd zijn om in aanraking te worden gebracht met voedingsmiddelen.
- Regulation (EU) 2024/3190 on the use of bisphenol A (BPA) and other bisphenols and bisphenol derivatives with harmonized classification for specific hazardous properties in certain materials and articles intended to come into contact with food, amending Regulation (EU) 10/2011 and repealing Regulation (EU) 2018/213
- Arrêté du 27 août 1987 relatif aux matériaux et objets en aluminium ou en alliages d'aluminium au contact des denrées, produits et boissons alimentaires.
- Regulation (EC) 1169/2011 concerning absence of the listed allergens in Appendix II .
- Article 5 of Regulation (EU) 2025/40 on Packaging and Packaging Waste, Repealing 94/62/EC
- EN 602 Aluminium and aluminium alloys - Wrought products - Chemical composition of semi-finished products used for the fabrication of articles for use in contact with food.
- Directive (EC) 1907/2006 REACH (Registration, Evaluation and Authorization of Chemicals) with possible amendments.
- FDA 21 CFR §178.3910(6) on surface lubricants used in the manufacture of metallic articles.
- Dutch commodities Act (Warenwet) Packaging and consumer Articles; Chapter IV – Metals
- Resolution CMRes (2020)9 (non legally binding Resolution) Metal and alloys used in food contact materials (based on analysis and/or evaluation from our raw material supplier)
- Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs), as amended.

4. Overall migration

This product complies with the overall migration limits, tested under conditions as defined in (EC) 10/2011. Test conditions from a higher OM level are excepted.

Simulant	Test condition	Result (mg/dm²)
Water	4h at 100°C / 212°F	Compliant
Olive Oil	2h at 175°C / 347°F	Compliant

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CVR: DK 37 75 40 13

5. Substances with limits and restrictions

The aluminium foil, used for the production of plain aluminium items, has been tested for specific release by the foil supplier in accordance with CM/Res(2020)9 using artificial tap water as simulant. Test conditions : 10 days at 40°C and 2h at 100°C. Worst case results for the release of aluminium are compliant to the limit of 5 mg/kg.

FCM	CAS no.	Substance	SML (mg/kg)	Result (mg/kg)
		aluminium – 2h at 100°C	5	1,7
		aluminium – 10d at 40°C	5	3,3

6. Dual use additives

As required by Regulation (EC) 10/2011 the following table identifies substances used subject to a restriction in food through an authorization as food additive that might be present.

7. Conditions of use

7.1 Regarding type or types of food

Intended for	
Aqueous foods	Yes
Acidic foods	No
Alcoholic foods	Yes
Fatty foods	Yes
Dry foods	Yes

7.2 Regarding time and temperature of treatment and storage of food :

Treatment time: Up to 2 hours at Max. 350°C / 662°F

7.3 Any other limitations of use :

The resistance of plain aluminium in contact with food depends on several factors, including pH level, salt content, food composition, spices, temperature, heating time, moisture, and the specific aluminium alloy used. Therefore, suitability should always be verified under actual application conditions to determine the exact shelf life and functionality.

Following limit values are commonly used in the industry:

- strongly acidic food: pH below 4.5
- salted food: salt content above 3.5%

Use in conventional oven	Yes
Use in microwave	Yes
Use for BBQ / Grill	Yes
Freezing	Yes
Storage after filling	-40 to +40 °C / -40 to +104 °F

8. Absence / presence of chemical substances

To the best of our knowledge and based on the information provided by our supplier(s), these compounds are not expected to be present in the above-mentioned product(s).

- **Mineral Oil Hydrocarbons (MOSH/MOAH)**
The food contact material/article is manufactured in accordance with applicable European Union requirements concerning Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH).
MOSH and MOAH are not intentionally added to the material/articles
- **Endocrine disruptors**
Substances classified as endocrine disruptors Category 1 for human health under Regulation (EC) No 1272/2008, substances identified as SVHC due to endocrine-disrupting properties under REACH are not intentionally used, unless specifically permitted by applicable EU legislation.
- **Bisphenol A (BPA) and Other Hazardous Bisphenols**
Bisphenol A (BPA, CAS No. 80-05-7) and its salts are not intentionally used in the manufacture of this material/article
- **Primary Aromatic Amines (PAA)**
The packaging material complies with the applicable requirements for Primary Aromatic Amines (PAA) under Commission Regulation (EU) No 10/2011, including the restrictions laid down in Annex II.
- **Phthalates**
The packaging material complies with the applicable requirements for phthalates under European Union legislation.
No phthalates are intentionally added unless their use is specifically authorised for the intended application under applicable European Union legislation.
- **POP**
Substances listed and restricted under the POPs Regulation are not intentionally used.
- **The packaging complies with Regulation (EU) 2025/40, Article 5**
 - SVHC / substances of concern: presence is minimised and applicable REACH requirements are fulfilled.
 - Heavy metals: the total concentration of Pb, Cd, Hg and Cr(VI) does not exceed 100 mg/kg. This requirement is carried over from the previous Packaging and Packaging Waste Directive 94/62/EC.
 - PFAS in food-contact packaging: PFAS is not intentionally added.
Compliance is supported by appropriate supplier documentation.

9. Inventory Storage

The articles should be stored in a clean and dry environment, protected from direct sunlight, chemicals, strong odours and extreme temperatures.

Storage between Max. 70% RH, 5-25 °C / 41-77 °F

Disclaimer

The information included in this document is based on the present state of our knowledge and is valid from the stated issue date until this document is superseded. Because of possible changes in the underlying legislation and regulations, as well as possible changes in this Product, we cannot guarantee that the status of this document will remain unchanged. It will be renewed in all cases where the previous conformity is no longer ensured.

The statement is based on documentation from Plus Pack suppliers of raw materials and goods. The declaration is indicative and applies to the product when used during normal and foreseeable conditions consistent with referred temperature-, time- and contact constraints.

Plus Pack will always assist in the choice of packaging, but the packer is ultimately responsible for choosing the right packaging for the product/process. The products must be tested until end of shelf lifetime by correct packaging trials to avoid process problems - product smell, taste or visual deformation of the total end-product. Re-use of the packaging is depending on both production process and product, and subsequently the re-use ability must be evaluated by the packer/producer.

Approved by the Quality Department.

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