



Emballages alimentaires

Ref.: DC-ANIA-2025 – Version: 2.0

**Declaration of compliance with the regulations relating to
Materials and objects in contact with foodstuffs**

1. Identity of the operator who establishing the declaration

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Date of issue : **15/12/2025**

Validity Period : 5 years (subject to product or regulatory changes)

2. Identity of the material and/or article subject to the declaration

Declares that the material and/or object referenced by the customer as follows:

Designation	Reference	Non-contractual photo(s)
Aluminum Roll Refill	ALU R200x0.29 ALU R200x0.44	

Indicate the component(s) material(s) constituting the structure of the article:

Material family	Aluminium	Wood	Paper/cardboard	Plastic
	X			

3. Confirmation of the conformity of the material and/or article subject to the declaration

Manufactured in accordance with the following regulations:

European legislation on food contact:

- Regulation (EC) No. 1935/2004 of 27 October 2004 on materials and articles intended to come into contact with foodstuffs;
- Regulation (EU) No. 2023/2006 of 22 December 2006, as amended, on good manufacturing practices for materials and articles intended to come into contact with foodstuffs;
- Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council



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Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and the Commission 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

French legislation on food contact:

- Decree of 27 August 1987 relating to materials and articles made of aluminium or aluminium alloys in contact with foodstuffs, products and food beverages

European standards:

- EN 602:2004 Standard on Aluminium and Aluminium Alloys - Wrought products - Chemical composition of semi-finished products used in the manufacture of articles intended for use in contact with food
- EN 14287:2004: Aluminium and aluminium alloys. Specific requirements for the chemical composition of products intended for the manufacture of packaging and packaging components

Other legislation(s):

- U.S. Food and Drug Administration FDA CFR Title 21 5172.830, 5172.884, 5178.3620(b), 5178.36506), 5178.3910 (a) et (b).
- The lubricant applied to the surface of the sheets is GMO-free and is of non-animal origin and the rolling oils used in the production process comply with FDA 21CFR178.3910 (Food and Drug Administration - Surface Lubricants Used in the Production of Metal Articles).

4. Intended Use Condition

Aluminium foils/articles are suitable for baking and heating all types of food products, however avoid storing, processing or cooking foods that are highly acidic, alkaline or very salty.

Note: Aluplast draws the attention of aluminium users to the aggressiveness of certain foods that can lead to the corrosion of aluminium such as salt, chocolate, tomato, lemon, apple, strong spices, alcohol, etc. It is recommended to carry out conservation tests before packaging these products.

In the event of a change in the packaged product, its composition or its intended use, as well as in the event of a change in the conditions of use of the material or object, the person to whom this declaration is addressed must ensure that the container/contents are compatible, for which he or she is then responsible.

5. Overall migration analyses:

It is required by law that migration tests in accordance with EC Regulation No. 10/2011 be carried out for plastic packaging that is respectively lacquered / coated and that is intended for food contact. Directive 97/48 includes a description of the test parameters.

The legally prescribed standard test procedure provides for tests with alcoholic, aliphatic or acidic food simulants.

However, with the alcoholic or aliphatic simulation, it is chemically impossible to test the migration for the aluminum alloy, aluminum being considered a neutral barrier. When testing with acid, corrosion can occur. This type of corrosion cannot be compared with migration.

Conformity has been verified in accordance with the EDQM standard - Metals and alloys used in materials and articles intended to come into contact with foodstuffs, COE (2013) - Practical guide for manufacturers and regulators. According to the EDQM Technical Guide and Annex IV of the Turkish Food Codex Regulation on Materials and Articles Intended to Come into Contact with Food – revised on 8 February 2019, the Specific Release Limit (SRL) for aluminium is 5 mg/kg food.

The material was tested using artificial tap water-DIN 10531 for 2 hours at 100 0 C and 10 days at 40 0 C. Specific Al release (SR) was found to be less than 5 mg/kg.

Heavy metal concentration limits (Pb, Hg, Cd, CrVI) comply with Directive 94/62/EC (concerning packaging and packaging waste) and its updates (<100 ppm)

6. The manufacturing facility confirms that the following substances are not intentionally introduced into the manufacturing process:

- Genetically modified substances (GMOs)
- Bisphenol A,B,F,M and S
- Allergen listed in Directive 1169/2011/EU and its amending regulations.
- Materials of animal origin
- MO(S)(A)H (saturated hydrocarbons/aromatics saturated with oils) according to 2017/84/EU
- Nanoparticles (Decree 201/232)
- Phthalates
- PAH
- NIAS (Non-Intentionally added substances).
- Biocides.
- Dual-purpose additives.
- PFAS (per- and polyfluoroalkyl substances).
- Asbestos.

7. Shelf Life

- There is no set technical shelf life for aluminum alloy products.
- Aluminum alloys do not lose their chemical and physical properties for a long time.
- Appropriate storage conditions must be provided in order to avoid external factors such as oxidation.
- Products packaged to avoid contact with air will keep for a long time in warehouses without strong temperature variations
- However, we recommend that our rollers be used within a maximum of 12 months after delivery.

8. Optimal storage and transport conditions;

- Long-term storage at 12-24 °C and short-term transport at 10-35 °C in as dry an atmosphere as possible
- Avoid moisture (humidity, condensation,...) and store in a closed room as dry as possible (max. 50% RH) Keep the storage area dry, clean and closed.
- Do not leave packages open.

9. Environmental requirements in packaging design and manufacturing:

Compliance with the provisions of Directives 94/62/EC and 2004/12/EC and Decree 2007/1467 (repealing Decree No. 98-638) on environmental requirements.

The products comply with the environmental requirements defined in the French Decree 2007-1467 relating to Book V of the Environmental Code, in particular for:

- Prevention by reduction at source,
- Compliance with heavy metal limits,
- Minimization of hazardous substances
- Recycling of the material standard EN 13430
- Energy recovery: Recoverable material standard EN 13431



- Sorting marking: The Triman logo (in accordance with the Anti-Waste Law for a Circular Economy: AGEC) is affixed to the dispenser boxes (secondary packaging) and cartons (tertiary packaging). The products must be deposited, after use and cleared of any food waste, in the appropriate sorting bins according to the local instructions of your community.

10. Traceability of information:

As required by Regulation (EC) 1935/2004, Article 17, Aluplast's supplier has put in place the necessary systems, records and procedures to ensure the traceability of items.

11. REACH:

Regarding the REACH regulation, which came into force on 1 June 2007, our manufacturing plant is a user of raw materials and as a result, the pre-registration and/or registration of chemical substances is deployed by its raw material suppliers.

Regarding the very dangerous substances (SVHC classified in particular) present in the latest list in force, the products are not concerned since our factory does not use them or is very much below the limit (< 1000 ppm), the products being intended for food contact.

12. Storage conditions

- Store in a dry, clean and well-ventilated place, without sunlight or direct heat sources.
- We recommend long-term storage at 12-24°C and short-term transport at 10-35°C, in as dry an atmosphere as possible.
- Avoid humidity (humidity, condensation, etc.) and store in a closed room as dry as possible (max. 50% RH)
- Allow 2-3 days in intermediate storage, when moving from cold to hot or humid treatment rooms.
- Package opened 2-3 hours before processing
- Products must be used within 3 years of their date of manufacture

13. Traceability and batch

- Lot Identification: Each production batch is identifiable by a number visible on the primary and secondary packaging.
- Regulatory Compliance: This traceability system complies with Article 17 of Regulation (EC) 1935/2004

14. Limitations of the declaration and responsibilities of the user

- This declaration is based on the documentation provided by our raw material suppliers and/or the manufacturer of the finished product.
- It is valid only for the material or article as delivered (empty packaging), and as long as there are no regulatory amendments or changes that could result in a change in the inertia of the material or article.
- Compliance is guaranteed subject to strict compliance with the conditions of storage, handling and use, taking into account the particular characteristics of the material or object, as provided for by usage or professional codes
- Responsibility of the User: In the event of a change in the characteristics of the packaged product (its composition or its destination), as well as in the event of a change in the conditions of use of the material or object, the person to whom this declaration is addressed must ensure the compatibility of the container and content, for which he or she alone assumes responsibility.
- ALUPLAST's warranty cannot be extended to the following situations:
 - Any subsequent change in the composition of the product covered by this declaration, by the addition of any substance.
 - An implementation that can lead to a denatured material.
 - Inadequate use of materials.
 - Verification of the reciprocal compatibility of the material and the packaged foodstuffs, as well as the non-modification of the organoleptic characteristics of the packaged foodstuffs. This verification is the exclusive responsibility of the user of the packaging with regard to its industrial process and the composition of these foodstuffs.
- The use of the products covered by this declaration is subject to the verification of their compliance with the standards in force as well as their technical conformity with regard to the use for which they are intended.



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- Any change in the purpose and/or regulations in force concerning this declaration will lead to its revision.
- ALUPLAST is only liable to the extent that its suppliers' declarations are in compliance.
- This statement supersedes any prior statement
- This declaration is drawn up pursuant to Article 16 of Regulation 1935/2004/EC, as well as Decree No. 2008/1469 of 30/12/2008 amending Decree No. 2007-766 implementing the Consumer Code with regard to materials and articles intended to come into contact with foodstuffs.

15. Recipient of the declaration

It is intended for the company: **WEBSTAR**

This declaration of conformity has been drawn up in the light of the following elements:

- Declarations of raw material suppliers (component of the material/object)
- Manufacturing Plant Declarations
- Global migration analyses (if concerned)