

PRODUCT STEWARDSHIP DISCLOSURE

SILGAN DISPENSING SYSTEMS MILANO S.R.L.

Strada Statale 35 dei Giovi, n. 1/B
20058 Zibido San Giacomo (MI), Italy

müller+krempel 

14.289.15

Certify to : **Logo-Plastic AG**

Compliance for the following product\:

- **7621850 - AV241Z-SPR*193503 - .SINFONIA.AV241Z.130.P01.PV180.ER15 P01 045/P02.CAPP. ST P00**

Food contact disclosure

- All components in contact with Customer product used to produce the above mentioned articles are in accordance with:
 - EU Regulation 1935/2004/EC
 - EU Directives 10/2011/EC (Reg. 2020/1245 excluded)
 - Regulation 1895/2005/EC
 - DPR 777/82 e and subsequent updates
 - DM 21/03/1973 and subsequent updates
- The resins used to produce pump components are made with monomers and additives listed in the EU legislation 10/2011 and that are restricted with a SML regarding EU Directive 2002/72.
- The compliance to the above mentioned regulations is guaranteed by migration tests carried out by Silgan Group according to OML and SML substances list given by the suppliers, through food simulants B, D1 and D2 at 40°C for 10 days. The test results showed migrations values below the legal limitations values.
- Colored components manufactured with P01, P05, P72, P90 and/or P91 masterbatches are included in the above mentioned components. Colored components manufactured with other masterbatches are excluded.
- The materials may contain substances regulated by Directives 89/107/EC, 88/388/EC, EC Regulation 10/2011/EU, DM 27/02/1996, n. 20, Legislative Decree No 25/01/1992 107, Legislative Decree No 27/01/1992 109 and Commission Decision 1999/217/EC. and Commission Decision 1999/217/EC. According to experimental data and / or theoretical calculations such substances are in accordance with art. 5a Directive 2002/72/EC and Art. 9 paragraph 2, letter c) of DM 21/03/1973. The user of the material intended for contact with food has a responsibility to inform the company in writing of any restrictions because of the compositional characteristics (presence of additives and flavor) of food to be packed.
- However, compliance with the overall and specific migration limits should be measured from the final packaging intended to come into contact with foodstuff by using real food or appropriate food simulants.
- It is the responsibility of the converter or food packer to verify that the final packaging complies with the overall and specific migration limits.

Disclaimer

THIS STATEMENT EXPIRES after one year or in case of regulatory changes before date of issue . Please ask for a new confirmation if needed.
Thank you for your interest in our products.

Date: 2021-12-20

Silgan Dispensing Systems Milano S.r.l.
Plant Manager
Giacomo Avogadro



DISCLOSURE

Silgan Dispensing Systems Milano S.r.l.
Strada Statale 35 dei Giovi, N. 1/B
20058 Zibido San Giacomo (MI) - Italy
Italy

Customer : **Logo-Plastic AG**

SILGAN Packaging Components:

- **7621850 - AV241Z-SPR*193503 - .SINFONIA.AV241Z.130.P01.PV180.ER15 P01 045/P02.CAPP. ST P00**

Dear customer,

We are pleased to respond to your inquiry regarding SILGAN pumps or spray dispensers (i.e., packaging components) and provide information to that can be used by "responsible persons or distributors" of cosmetics products to fulfill their obligations under the new EC Regulation on Cosmetics Regulation (1223/2009). This information is intended to provide information that can be used by the "responsible person" to conduct a "safety assessment" of their cosmetic product as is required under EC 1223/2009 (articles 3, 5, 6, 10, 11 and 17).

The following provides information about raw materials used to make packaging components of listed SILGAN pumps or spray dispensers that directly will contact packaged cosmetics (i.e., within direct fluid pathway). This information is provided to assist the "responsible person" to conduct a safety assessment and prepare a Cosmetics Product Safety Report - Section 4. Impurities & Traces Information about Packaging Materials" (refer to Annex I Part A of 1223/2009):

- List of "Prohibited substances" in Cosmetics Products (1223/2009 - Annex II)
- Substances classified as CMR substances - carcinogenic, mutagenic or toxic for reproduction (CMR), category 1A, 1B and 2, under Part 3 of Annex VI to Regulation (EC) No 1272/2008

This following disclosure is based on our product formulations, technical knowledge of material science, our qualified raw material manufacturers' product regulatory declarations and composition/ impurity disclosures (received to date), and our targeted validation testing to determine if there are detectable concentrations of key "chemicals of concern" in select product components. The above is done in accordance with SILGAN's Product Stewardship and Good manufacturing Practices (GMP) commitments.

Absence of "Prohibited substances" listed (1223/2009 - Annex II and III):

- SILGAN does not intentionally add any prohibited substances listed in Annex II and Annex III of EC Regulation 1223/2009
- SILGAN does not know of the presence of any prohibited substances in our packaging components based on disclosures and certifications received to date from raw material manufacturers.

Absence of CMR Classified Substances (Article 15)

- SILGAN does not intentionally add any CMR substances listed as category 1A, 1B and 2, under Part 3 of Annex VI to Regulation (EC) No 1272/2008
- SILGAN does not know of the presence of any such CMR substances in our packaging components based on disclosures and certifications received to date from raw material manufacturers.

This statement is valid from the date below and will be replaced when significant changes occur in the production of material capable of changing the essential requirements for compliance or where legislative references in paragraph 1 shall be modified and updated to require a new verification of compliance.

Ultimately customers must make their own determination that their use of our product is safe, lawful and technically suitable in their intended applications, as required in the article no. 3 of the European Regulation 1935/2004.

SILGAN is not responsible for any contamination that could take place in the subsequent processing of the product carried out by cosmetics product packagers or customers.

Disclaimer

This determination is based upon information available as of the date of this submission, which primarily includes component supplier disclosures and Safety Data Sheets (SDSs). It may also include technical data sheets; any additional information provided by suppliers; testing, if applicable and available; and/or general industry knowledge. This letter shall apply to the packaging listed above as shipped and as of the date of shipment. This letter shall remain valid until the time shown here below, unless superseded by a new compliance statement. This statement does not alter, amend, supersede or in any way affect any existing terms and conditions of sale of purchase between the parties, including Terms and Conditions and/or any contracts or contractual commitments between the parties.

Ultimately customers must make their own determination that their use of our products is safe, lawful and technically suitable in their intended applications.

The product composition information provided above is provided in "good faith" for customers to consider when performing their own determinations of the fitness for use of the SILGAN packaging components for their product and its intended uses. Ultimately customers must make their own determination and conduct appropriate testing to assure that the use of the packaging and packaging components are safe, lawful and technically suitable in their intended end use applications. This information in no way modifies, amends, enlarges, or creates any specification or warranty, and ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, ARE HEREBY EXCLUDED.

Thank you for your interest in our products.

Date : 2021-12-20 (valid for 1 year)

Silgan Dispensing Systems Milano Srl
Plant Manager
Giacomo Avogadro

