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To whom it may concern:

As you required us, we assure that the products (Crown Corks 26-29mm: ETP 2, 6, 62, 10, 102, 130303, 2021, 20212, 2081, 20812, 2101, 2102, 2111, 21112, 2141, 21412) that we produce, are according with all the European normative applicable to packaging alimentary products. The Crown corks are made of low carbon steel electrolytically coated with Cr/Sn (it may incorporate between 10% and 60% recycled metal from PCR material, without changing its properties or posing any risk to the end user, and with a PVC FREE plastic gasket (based on polypropylene, not incorporating recycled materials, nor BPA nor phthalates).

As declared by external suppliers, so-called "PVCfree" lining plastic compounds (as general description), used for the production of our metal crowns are based on low density polyethylene (LDPE) and therefore free from any PVC and phthalic plasticisers, Bisphenol-A (BPA) and foaming agents (included AZDC).

The different PVC FREE plastics vary their SBS percentage without altering their chemical composition, and therefore the hardness of the plastic compound varies, linked to its application (returnable bottle, one way, low gauge, etc.).

Metal crowns produced by J. COMBALIA S.A and lined with "PVCfree" plastic lining compounds have therefore to be considered totally approved and suitable for application on bottles containing both still and sparkling beverages such as mineral water, low alcoholic content (up to 15% v/v ethanol) as beers and wines, soft drinks and fruit juices, lactic drinks, with hot fill-pasteurization (max 70°C 30 min.).

Regarding varnishes and inks, we also produce with BPA-free varnishes and inks (non-intended use) according BPA REGULATION (EU) 2024/3190, as declared by the external supplier.

In addition, the varnishes and inks are PFAS (PFASNI)-free as declared by the external supplier, as required by Regulation 2024/2462, and regulation EU 2025/40 and lastly modifications.

The corks also meet the requirements of the PPWR, according ITENE test report IE26-0555, specifically regarding:

- Heavy metals (lead, cadmium, mercury, and hexavalent chromium) — Article 5, paragraph 4,
- Per- and polyfluoroalkyl substances (PFAS) — Article 5, paragraph 5.
 - o Based on official communications from our industry, our suppliers, and our knowledge of our processes, "PFAS" (per- and polyfluoroalkyl substances) are not intentionally used as raw materials or additives during the product's manufacturing process, and the formation of such substances during these processes is not anticipated. Consequently, it can be stated with reasonable certainty that the product does not contain intentionally added "PFAS."
 - o SVHC— Article 5.

Therefore, the crown cork produced are according with the EU regulations about materials in contact with alimentary products and its production, like 10/2011 (included regulation 2018/213, 2018/831, 2019/37, 2019/88, 2019/1338, 2020/1245, 2023/1442, 2023/1627), regulation 1935/2004, directives 90/128, 2002/72, 2004/19 and lastly modifications.

Regarding global migration: 90/128/CEE repealed by 2002/72/CE and modified by 2004/19/CEE, 82/711/CEE modified by 97/48, and 85/ 572/CEE (and later modifications).

Food regulations being the most restrictive that is applicable to us, it is clear that we also comply with Regulation (EC) No. 1907/2006 of the European Parliament and of the Council, of December 18, 2006 (and lastly modifications), regarding registration, evaluation, authorization and the restriction of chemical substances and preparations (REACH).

Also, the substances contained in our products, are MOSH-MOAH free, and we even use the machine lubrication oil MOSH-MOAH free.

Packing waste 94/62, partially derogated by 99/177 and modified by 2004/12 and 2005/20, and lastly modifications. And 2023/2006 (GMP, modified by regulation 282/2008) and lastly modifications.

Regarding the composition of the liner, as certified by the suppliers, it complies with the migration limits established by the legislation (both specific and global migration):

- Starting substances in the liner, subject to restrictions (LMS):

The limit established for these substances by Regulation (EU) No 10/2011 is higher than the global migration value under the same conditions, or it is not detectable, due to the low concentration of these compounds in the liner. In these cases, compliance with the global migration implies compliance with the component-specific migration.

FCM	PM Ref	Designation	CAS No.	Restriction	Remarks
141	13380	1,1,1-Trimethylolpropane	77-99-6	SML = 6 mg/kg	< 1%
223	13630	Butadiene	106-99-0	SML = ND	(*)
294	93120	Thiodipropionic acid, didodecyl	123-28-4	SML(T) = 5 mg/kg	
384	40000	2,4-Bis-(octylmercapto)- 6-(4-hydroxy-3,5-di-tert-butylanilino)-1,3,5-triazine	991-84-4	SML = 30 mg/kg	
433	68320	Octadecyl 3-(3,5-Di-tert-butyl-4-hydroxyphenyl) propionate	2082-79-3	SML = 6 mg/kg	
--	--	Undisclosed substance	--	SML = 30 mg/kg	
--	--	Undisclosed substance	--	SML = 5 mg/kg (as Li)	
--	--	Aluminium, compounds	--	SML = 1 mg/kg	Annex II, as Al.
--	--	Lithium, compounds	--	SML = 0,6 mg/kg	Annex II as Li.
--	--	Zinc, compounds	--	SML = 5 mg/kg	Annex II as Zn.
246	25150	Tetrahydrofuran	109-99-9	SML = 0,6 mg/kg	Solvent
--	--	Peroxide	--	SML = 0,05 mg/kg (as O)	Res. AP (92) 2

(*) Q_m = 1 mg/kg final product

- Dual use additives:

As said in the previous point, it is also applicable to the dual-use substances that the liner incorporates, in no case these substances exceed the specific migration limit, are not detectable, or even do not an assigned one.

FCM	PM Ref	Designation	CAS No.	Number	Max. %	Remark
106	89040	Sodium, potassium and calcium salts of fatty acids	--	E 470 a	1 %	
193	24610	Vinyl benzene	100-42-5	FL 01.015		Monomer
504	86240	Silicon dioxide	7631-86-9	E 551	1 %	

- Global migration analysis:

Carried out by an external laboratory (Aiju - Lab. Echevarne), under the test conditions defined by regulation (CE) 10/2011, and according to the UNE1186 / 3 method: UNE EN 1186-3: 2002.

The tests have been carried out according to a ratio of the surface in contact with the food and a volume of simulant used in the migration of: 2.5 dm² (Bottle + internal surface of the cap) / 220 ml of liquid. With the following result:

MUESTRA/ SAMPLE / ECHANTILLON	Migración Global//Overall migration//Migration globale (mg/dm ²)	Valoración//Assessment//Évaluation
Límite/ Limits/Limites	10	
W01546221 Tapón corona ORO CAVA I ORO PINT. 29MM 04/02/2025. (Lote: OF: 58234/1). Referencia de cliente: BTE- SVELON 855 B WITE 2024460976-8 25-11-2024	V.I: 0.4, 0.3, 0.3. V.M: 0.4.	C

- Specific migration for metals according to point 1 of Annex II of EU Regulation 10/2011:
Carried out by an external laboratory (see Aiju migration report document - Lab. Echevarne), element analysis using ICP-MS according to PN-327 based on EU Regulation 10/2011.
Migration rate: 2.5 dm² / 220 ml.
Ratio of contact surface with food vs. volume used: 6 dm²/kg.
Simulant (acetic acid 3% 60°C / 10 days)

Designación L/0092291-4

W01546221 Tapón corona ORO CAVA I ORO PINT. 29MM 04/02/2025. (Lote: OF: 58234/1). Referencia de cliente: BTE- SVELON 855 B WITE 2024460976-8 25-11-2024			
Elemento Element Élément	Valor medio// Mean value // Valeur moyenne	Límites/ Limits (mg/kg)	Valoración/ Assesment/ Évaluation
Al	<0.24	1	C
Ba	<0.24	1	C
Co	<0.02	0.05	C
Cu	<0.24	5	C
Fe	<0.24	48	C
Li	<0.24	0.6	C
Mn	<0.24	0.6	C
Ni	<0.02	0.02	C
Zn	<0.24	5	C
Sb	<0.02	0.04	C
As	ND	ND	C
Cd	ND	ND	C
Cr	ND	ND	C
Hg	ND	ND	C
Pb	ND	ND	C
Eu	<0.05	Suma <0.05	C
Gd	<0.05		
La	<0.05		
Tb	<0.05		

ND: no detectado // not detectable // non détecté (LC <0.01 mg/kg) // (LC (Cd) <0.002 mg/kg).

- Functional barrier:
The product is not a multilayer object with a functional barrier.

In our production process, we don't use raw materials deliberately that are based on heavy metals, or that contains

forbidden products according to the current legislation. Only may be possible in case of impurities and never as components in the formulation of the raw material.

It is clear that if we don't use raw materials based on heavy metals (lead, mercury, cadmium, hexavalent chromium) or other forbidden product, neither we use these materials deliberately in our productive process.

We request to all the suppliers, a declaration of conformity of the raw materials that they send us, and it mustn't surpass the limits that the law marks. We always work with suppliers that work according the normative.

Regarding the packing, all the elements used by us (pallets, boxes, plastic bags, etc...) are according with the levels of heavy metals marked by the law, and this is ratified by the certification that the suppliers give us.

- The crown cork must be used before one year from its manufacturing date (with good storage conditions).

According to experience, and under the approval of the client, the self-life for a 26mm crown cork used in a bottle is 12 months more (beer, juice and soft drinks) and 24 months for mineral water. In the case of the 29mm crown cork applied in a bottle for use in sparkling wines/cava/champagne, as multiple parameters influence (corking process, bottles, humidity and cava temperature, etc.), it must be determined by the client, but we do not recommend exceeding 12 months for the TP/TFS cap, 24 months for Al caps and 36 months for the stainless steel cap.

- The product does not contain genetically modified organisms (GMOs), allergens (in the case of sodium sulfite, it is not detectable in migration tests and is therefore not considered an allergen), nor has it been treated with ionizing radiation.

Yours sincerely,



Javier Borque Marcén
Technical Manager