

DECLARATION OF CONFORMITY

Natural, agglomerated and micro-agglomerated cork closures

DOCUMENT REF.
EUR-DOC-FCM-CORK-001 / 2026

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1. Scope of this declaration

This declaration applies to the cork closures manufactured and/or supplied by **Eurocork NV** for use as closures in contact with foodstuffs, including wines, spirits, and other alcoholic and non-alcoholic beverages. The closures are catalogued as follows:

- **One-piece natural cork stoppers.**
- **Agglomerated technical cork stoppers**, with or without cork washers (classic technical stopper).
- **Micro-agglomerated technical cork stoppers**, in variants for still wine and for sparkling wine.

The declaration covers these closures in all configurations and in all dimensional and qualitative variants supplied. It covers each closure as a whole, including the natural cork or cork granulate, the binder system where applicable, the cork washers where fitted, and the surface lubrication applied to the closure. The closures are, for the purpose of Regulation (EU) 2025/40 (PPWR), considered to be food-contact packaging.

2. Materials description

The closures covered by this declaration are manufactured with the following materials:

MATERIAL	APPLIES TO	REFERENCE
Cork	One-piece natural cork stoppers	—
Cork granules of various granulometry	All technical closures	—
Cork washers	Technical stoppers fitted with washers	—
Glues composed of polyurethane	All technical closures	FDA 21 CFR 175.105
Microspheres composed of synthetic blowing agents	Certain micro-agglomerated closures for sparkling wine	FDA FCN No. 1636
Silicone lubricants	All cork stoppers	FDA 21 CFR 176-180; 178-3710; 175-300; 177-2600; 73-575; 181-28

A dash indicates that the material is cork of natural origin, for which no synthetic-material clearance reference applies.

3. Applicable European and national legislation

The cork closures supplied by Eurocork NV are designed, manufactured, and controlled in accordance with the following framework, as it relates to food-contact materials:

- **Regulation (EC) No 1935/2004** on materials and articles intended to come into contact with food, in particular Article 3 (general safety requirement), and successive amendments.
- **Regulation (EC) No 1895/2005** on the restriction of the use of certain substances in materials and articles intended to come into contact with food, and successive amendments.
- **Regulation (EU) No 10/2011** on plastic materials and articles intended to come into contact with food (migration limits), and successive amendments.
- **Regulation (EC) No 2023/2006** on good manufacturing practice (GMP), and successive amendments.

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- **Directive (EEC) No 89/109** and successive amendments.
- **Regulation (EU) 2025/40 (PPWR)** on packaging and packaging waste — see section 9.
- **Regulation (EC) No 1907/2006 (REACH)**, including Annexes XIV and XVII and the ECHA Candidate List of substances of very high concern.

National legislation applicable at the manufacturing site

- Ministerial Decree 21/03/1973 and successive amendments.
- D.P.R. 777/82 and successive amendments.

References

- **Resolution AP (2004) 2** of the Council of Europe of 1 December 2004 and successive amendments, on corks and other cork materials and articles intended to come into contact with food.
- **Resolution AP (2004) 5** of the Council of Europe of 1 December 2004 and subsequent amendments, on the use of silicone intended to come into contact with food products.

4. Declaration of compliance

On the basis of the composition of our products, the manufacturing process applied, and the written confirmations received from our raw-material and auxiliary suppliers (cork, cork granulate, binder, surface lubricants), **Eurocork NV hereby declares that** the cork stoppers covered by this declaration, in all configurations and dimensional and qualitative variants supplied, are in compliance with the legislation listed in section 3.

The global migration limit, along with the other specific restrictions to which the monomers present in the stopper may be subject, is respected under the conditions of use set out in section 5. This statement is supported by analytical evidence or based on calculations of substance migration conducted in accordance with the current directives. The user of the finished product is responsible for communicating any restrictions arising from the food product to be packaged.

5. Intended food-contact conditions and migration testing

Intended food-contact conditions: long-term storage above 6 months at room temperature. The stoppers cannot be reused.

Food-suitability (migration) tests were carried out according to total-immersion methods on the liquid in contact, under the following conditions:

SIMULANT	CONTACT TIME	TEST TEMPERATURE
B — acetic acid 3 % (w/v)	10 days	60 °C
C — ethanol 20 % (v/v)	10 days	60 °C

6. Substances with specific migration limits (SML)

The following substances with an SML or otherwise restricted according to Annexes I and II of Regulation (EU) No 10/2011 are present in the stoppers:

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DOCUMENT REF.
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SUBSTANCE	CAS NO.	SML
2,4-toluene diisocyanate	584-89-9	nd
2,6-toluene diisocyanate	91-08-7	nd
1,4-butanediol	110-63-4	5
octadecyl 3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate	2082-79-3	6

SML expressed in mg/kg of foodstuff. nd = not detectable.

7. Dual-use substances

The following dual-use substances are present in the stoppers supplied lubricated and ready to use:

SUBSTANCE	CAS NO.
Polydimethylsiloxane (PDMS)	63148-62-9
2,6-di-tert-butyl-p-cresol (E 321)	128-37-0
Acetic acid (E 260)	64-19-7
Citric acid (E 330)	77-92-9
Sodium hydroxide (E 524)	1310-73-2

Their presence depends on the lubrication applied.

8. Substances of concern — negative declaration

To the best of our knowledge, and based on testing and on the statements of our raw-material suppliers, the following substances are not intentionally added in the production of the stoppers:

- Bisphenol A (BPA) or other hazardous bisphenols as defined in Regulation (EU) 2024/3190.
- Phthalates (DEHP, DBP, BBP, DIBP, DINP, DIDP, DNOP) in a percentage greater than 0.1 % m/m.
- DMF (dimethyl fumarate), PVC, PVDC, MOSH, MOAH, PFAS, chlorinated polymers, GMOs, nanoparticles, substances of animal origin or their derivatives, and ochratoxin A.

The materials used comply with the requirements of Regulation (EC) No 1907/2006 and Regulation (EU) No 10/2011, and subsequent amendments, ensuring that any accidental migration of such substances complies with the applicable specific migration limits (SML).

REACH and SVHC

In accordance with Regulation (EC) No 1907/2006 of 18 December 2006 (Article 2, paragraph 7(b) and paragraph 9), and successive amendments, the stoppers are exempt from REACH registration. No substance of very high concern listed in Annexes XIV and XVII of that Regulation, or on the ECHA Candidate List, is used or intentionally added in a rate greater than 0.1 % w/w.

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Allergens

No substances listed in Annex II of Regulation (EU) No 1169/2011 of the European Parliament and of the Council are present in the stoppers.

Heavy metals and iron

The heavy metal content of the stoppers, as well as the iron content, is below the applicable legal limits (Ministerial Decree 29/12/86).

Irradiation

No irradiation treatment is used at any step of the production process.

9. Conformity with Regulation (EU) 2025/40 (PPWR)

The closures covered by this declaration are, for the purposes of **Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)**, considered to be food-contact packaging. On the basis of the composition of the products, the manufacturing process applied, and the written confirmations received from our raw-material and auxiliary suppliers, Eurocork NV declares that:

- **PFAS** — no per- or polyfluoroalkyl substances are intentionally added to the closures, nor to any of the raw materials, auxiliaries or surface treatments used in their manufacture. To the best of our knowledge the closures comply with the PFAS concentration limits for food-contact packaging set out in **Article 5(5) of Regulation (EU) 2025/40**, namely ≤ 25 ppb for any individual PFAS and ≤ 250 ppb for the sum of PFAS measured by targeted analysis, and ≤ 50 ppm for total fluorine derived from PFAS. These limits apply from **12 August 2026**.
- **Heavy metals** — the heavy metal content of the closures is below the applicable legal limits, as stated in section 8. The PPWR carries over from Directive 94/62/EC the restriction on the sum of the concentration levels of lead, cadmium, mercury and hexavalent chromium in packaging and packaging components.
- **Substances of concern** — the natural cork, the cork granulate, the polyurethane binder system, the microspheres and the silicone and/or paraffin surface lubricants used are free from intentionally added substances of concern as listed in section 8, and are non-fluorinated. No fluoropolymer (PTFE, PVDF, FEP, PFA) coatings or fluorotelomer-based finishing agents are used on the product or on production tooling in direct contact with the closure body.
- **Material composition** — the closures are cork-based articles, consisting either of one-piece natural cork or of cork granulate bound with a polyurethane binder, with cork washers where fitted. They contain no metal, glass, paper or plastic film components, and no separable packaging components requiring individual material identification.

The requirements of the PPWR concerning recyclability and design for recycling, packaging minimisation, and packaging labelling and marking are being assessed for these closures and will be addressed in a dedicated statement, in accordance with the application dates set out in the Regulation. Obligations relating to the packaged product as placed on the market, including the packaging as a whole, rest with the filler.

10. Certification and good manufacturing practice

The production site used for the products covered by this declaration operates in accordance with Regulation (EC) No 2023/2006 on good manufacturing practice, and is certified according to the following standards:

- ISO 9001:2015

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- ISO 22000:2018
- BRCGS — Packaging Materials
- FSC — Chain of Custody

The production site has complied with the requirement of Decree 29/2017 providing for the communication of food-contact material production plants to the competent health authority.

11. Basis, limitations and validity

This declaration is based on (i) Eurocork NV's own knowledge of the composition and manufacturing process of the products covered, (ii) written confirmations received from the relevant upstream raw-material and auxiliary suppliers, and (iii) the regulatory framework in force at the date of issue.

The closures are in compliance when used under the conventional conditions described in section 5 and in Regulation (EC) No 1935/2004. The user of the finished product shall verify that the closure is suitable for the intended foodstuff, and the industrial food packer is responsible for ensuring that overall and specific migration levels remain below their stipulated limits in the actual packaging configuration.

This declaration shall remain valid until material changes occur in the product composition, the manufacturing process, or the applicable European or national legislation, and at the latest **three (3) years** from the issue date. Upon the release of this declaration, all previous versions lose their validity. For any question regarding this declaration, or to request supporting documentation, please contact the Eurocork NV Quality & Regulatory Affairs department at the address in the footer.