



**PGL401 – Pattersons Glass Ltd
Compliance and Conformity
For Glass, Caps,
EU Regulations, Heavy Metals & REACH**

Issue 1 Dated 1st March 2021

We certify that all glass and caps supplied by Pattersons Glass Ltd conform to the relevant specifications and that all appropriate quality procedures to achieve this result are in place and operational.

Declarations adhered to:

All White Flint and Amber glass supplied meet the Materials and Articles in Contact with Food (England) Regulation 2005 and Regulation (EC) No. 1935/2004 of the European Parliament and of the Council of 27th October 2004

Amber & UVAG/Green also meets the requirements for light in the US and European Pharmacopoeia and British Standard BS1679 – containers for Pharmaceutical Dispensing.

Statutory Instrument 2003 No. 1941 – The Packaging (Essential Requirements) Regulations 2003
All Tin Plate Caps also meet the Materials and Articles in Contact with Food Regulation (EC) No. 1935/2004

(EU) no 10/2011 is a specific measure for plastic food contact materials as mentioned in the European Framework Regulation EU 1935/2004 the “Framework” Regulation and EC N° 2023/2006

On materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC

The soda-lime – silica glass manufactured in Amber, UVAG/Green and white flint meets the requirements of the British Pharmacopoeia and the European Pharmacopoeia 2002 for hydrolytic resistance type III and the US Pharmacopoeia (25) III for hydrolytic resistance.

Migration

EU Directive 94/62/EC – Heavy Metals

Statutory Instrument 2003 No. 1941 – The Packaging (Essential Requirements) Regulations 2003

This is to certify that all White flint and Amber glass supplied by Pattersons Glass is manufactured and conforms to the requirements of the EU Directive 94/62/EC and Statutory Instrument 2003 No. 1941 with respect to Heavy Metals, specifically lead, mercury, cadmium and hexavalent chromium.

To this end, the EU derogation for glass allows the above heavy metals up to an increase content of 200ppm, as opposed to the standard 100ppm for all other industries.

Tin Plate Caps Suitable for Food Use

Pattersons Glass Ltd certify that the caps we supply comply with Regulation EC No. 1935/2004 (the “Framework” Regulation) and EC N° 2023/2006

- Internal protective coatings comply with Regulation EC No. 1895/2005 (on certain epoxy materials)
- External protective coatings and inks are selected and applied such that compliance of the can and end with Regulation EC No. 1935/2004 is not compromised.

- Caps sealant compliance with EU Directive 2002/72/EC as amended (2007/19/EC).

Coated metal food caps is not yet covered by specific harmonised food contact legislation at the European Union level. However:

- The food contact components of the caps covered by this Certificate comply with the requirements of §31 (1) of German Food and Commodity Law.
- The Steel substrate complies with the relevant European Standards; EN10333 (tinplate) and EN10335 (ECCS).

Furthermore, the food contact coatings of the cans and ends covered by this certificate comply with the requirements of [Council of Europe Resolution AP(2004)1 (relating to Surface Coatings)] [*Industry Coatings Code of Practice*] and Council of Europe Resolution AP(92)2 (relating to Aids to Polymerisation). The CEPE exclusion list is respected for all coatings used.

REACH in relation to glass containers

Pattersons Glass has been continuously monitoring the requirements and impacts of the REACH legislation through close collaboration with our UK and European glass manufacturers associations, FÉVÉ and CPIV.

Our position in relation to REACH can be summarised as follows:

All production in the form of glass containers is defined as 'articles' according to REACH (as opposed to 'substances'). Therefore, our glass containers are not required to be registered.

The REACH regulation with respect to Annexes IV and V has been recently reviewed and amended by the European Commission.

In the final Amendment of Annex V, Glass is listed as exempted (COMMISSION REGULATION (EC) No 987/2008), if it does not contain dangerous substances above relevant concentration limits.

To the best of our knowledge all our glass containers conform within the required limits.

All our manufacturers are also fulfilling their obligation as downstream users of substances and preparations in the glass manufacturing process. They are currently taking all the necessary steps to ensure that our supplied materials are pre-registered for our specific use.

Regarding the glass containers, aluminium caps, plastic caps and swing stopper for food use supplied to your Company, the following can be declared:

- All Bottles, jars, caps and closures are produced in plants located in Europe / UK and therefore inside the European Community.
- The producers always observe the contents of the previous Directives through the accomplishment of control criteria and carrying out periodical analyses as an evidence of what declared.
- The contents of the previous Directives refer to the aforesaid Regulation; because of this it can be declared that all the containers supplied are produced with glass qualified for the packaging of every type of food, in conformity with the law.
- Regarding traceability, referring to the article No. 17 of the aforesaid Regulation, goods are supplied with a label attached on every pallet or box (which represents the unit of product), contains the indications to obtain in a univocal way the necessary information.

There shall be no changes made to the specification unless previously agreed. This is in line with our BRCGS Accreditation and approved supplier register.

SIGNED BY

Signature: *MSchofield*

Name: Mark Schofield

Position: Director