

Vieira de Leiria, 25<sup>th</sup> of May, 2025.

## FOOD CONTACT STATEMENT

### To our Valued Customer:

Food comes into contact with many materials and articles during its production, processing, storage, preparation and serving, before its eventual consumption. Such materials and articles are called **Food Contact Materials (FCMs)**.

FCMs should be sufficiently inert so that their constituents neither adversely affect consumer health nor influence the quality of the food.

Böllinghaus Steel does not produce finished articles for food contact, i.e., products will undergo further transformations through the downstream supply chain until they reach the end use. Nevertheless, upon request, Böllinghaus Steel supplies stainless steel grades compatible with food contact (Table 1).

**Table 1** - Non-exhaustive list of stainless steel grades compatible with food contact supplied by Böllinghaus Steel.

EN 10088 Standard		AISI / ASTM	UNS
1.4005	X12CrS 13	AISI 416	S41600
1.4006	X12Cr 13	AISI 410	S41000
1.4016	X6Cr 17	AISI 430	S43000
1.4021	X20Cr 13	AISI 420	S42000
1.4028	X30Cr 13		
1.4057	X17CrNi 16-2	AISI 331	S33100
1.4062	-	-	S32200
1.4301	X5CrNi 18-10	AISI 304	S30400
1.4305	X8CrNiS 18-9	AISI 303	S30300
1.4306	X2CrNi 19-11	AISI 304L	S30403
1.4307	X2CrNi 18-9		
1.4362	X2CrNiN 23-4	-	S32304
1.4401	X5CrNiMo 17-12-2	AISI 316	S31600
1.4404	X2CrNiMo 17-12-2	AISI 316L	S31603
1.4432	X2CrNiMo 17-12-3		
1.4436	X3CrNiMo 17-13-3	AISI 316	S31600
1.4462	X2CrNiMoN 22-5-3	-	S31803
1.4541	X6CrNiTi 18-10	AISI 321	S32100
1.4542	X5CrNiCuNb 16-4	ASTM Type 630	S17400
1.4547	X1CrNiMoCuN 20-18-7	-	-
1.4571	X6CrNiTi 17-2-2	ASTM Type 316Ti	S31635



## Europe:

The European Community Regulation 1935/2004/EC defines the requirements for materials and articles intended to come into contact with food, while Commission Regulation (EC) No 2023/2006 lays down rules on good manufacturing practice (GMP) for materials and articles that come into contact with food.

The main requirements of these regulations concerning Böllinghaus Steel semi-finished stainless steel products are:

- Materials and articles shall be manufactured in compliance with good manufacturing practice, as laid down in Commission Regulation (EC) No 2023/2006, so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could endanger human health or bring about an unacceptable change in the composition, taste or appearance of the food (*EC Regulation No 1935/2004, Article 3*).

*Supported by numerous studies that have shown that when used properly there is no harmful release of metals from the above-mentioned stainless-steel grades and in the knowledge that corrosion resistant stainless steels are inert and do not influence the color, taste or appearance of the food, we are able to ensure compliance with article 3.*

- The traceability of materials and articles shall be ensured at all stages to facilitate control, the recall of defective products, consumer information and the attribution of responsibility (*EC Regulation No 1935/2004, Article 17*).

*Böllinghaus Steel stainless steel processed material is traced in all processing stages, fulfilling the requirements of article 17.*

Complementarily, the Council of Europe through Resolution CM/Res(2020)9, issued recommendations and general guidance on the use of substances in the manufacture of food contact materials and articles, labeling and the need for a declaration of conformity and supporting compliance documents. For Metals and alloys, this is supplemented by the Technical Guide *Metals and alloys used in food contact materials and articles* published by the Directorate for the Quality of Medicines & HealthCare of the Council of Europe (EDQM) where specific release limits for metal elements and migration/release testing methods are defined.

It is important to note that the responsibility to ensure release testing lies primarily with the business operator who places the final material or article on the market. This is typically the manufacturer of the final product, but it can also be an importer, distributor, or other entity depending on the specific stage of the supply chain and the jurisdiction.

There are no universal composition limits for stainless steels used in food contact applications, although there are legislative requirements in France, Italy and Greece. In the UK, there are numerous specifications for a wide range of food contact applications for stainless steels. Other countries also have similar regulations.

In addition, there are European and International standards for certain types of application of stainless steels. The composition limits for stainless steels for table cutlery are specified in EN ISO 8442-2; specified compositions are linked to the application of the table cutlery.

## France:

The NF A36-711:2021 standard of, issued by the French Association for Standardization (AFNOR), specifies requirements for stainless steel products intended for contact with foodstuffs, products, and beverages for human and animal consumption.

The standard specifies that stainless steels must contain a minimum of 13% chromium to ensure adequate corrosion resistance. It also sets maximum allowable contents for certain alloying elements:

- Molybdenum (Mo), Titanium (Ti), Aluminium (Al), and Copper (Cu): up to 4% each.
- Tantalum (Ta), Niobium (Nb), and Zirconium (Zr): up to 1% each.

These limits are established to prevent excessive migration of metals into food, which could pose health risks.

### **Italy:**

In Italy, Materials and Objects in Contact with Food (MOCA) are regulated by a combination of European regulations and national provisions, with the aim of guaranteeing food safety and consumer health.

Regarding, stainless steel, Annex I of the *Regolamento recante l'aggiornamento al decreto del Ministro della sanita' 21 marzo 1973, recante: «Disciplina igienica degli imballaggi, recipienti, utensili, destinati a venire a contatto con le sostanze alimentari o con sostanze d'uso personale», limitatamente agli acciai inossidabili. (23G00009) (GU Serie Generale n.15 del 19-01-2023)* includes positive lists of materials and their permitted compositions.

Hereupon, articles made from Böllinghaus Steel stainless steel above-mentioned grades meet the requirements of Regulation (EC) No 1935/2004 and Regulation (EC) No 2023/2006, provided that the appropriate steel grade is used for the final product and further reprocessing is performed according to good manufacturing practice.

The 3.1 certificate declares the composition of the steel, and proper industrial hygiene practices provide guidelines for handling the materials safely. For compliance analysis Böllinghaus Steel recommends see the EN 10204 3.1 Inspection certificate that it is provided in each supply.

The end-user should always take care of selecting an appropriate steel grade for any specific purpose.

Moreover, for optimal performance, Böllinghaus Steel reminds customers that the surface of the stainless steel it supplies can be cleaned to ensure the removal of any possible traces of substances that could be harmful to the intended application.

Best regards,

A handwritten signature in black ink, appearing to read "David Reis".

David Reis  
Quality & HSE Manager