

DECLARATION OF COMPLIANCE – PPWR

This Declaration of Compliance is issued by Creative Caps s.r.o. (the “Manufacturer”) in accordance with Regulation (EU) 2025/40 on Packaging and Packaging Waste (the “PPWR”). It applies to the aluminium closures placed on the EU market by the Manufacturer and confirms compliance with the applicable requirements of Articles 5 to 12 of the PPWR.

1. Product Description and Intended Use

The aluminium closure is a mechanical component that, together with an internal sealing liner, seals the bottle. The closure itself does not come into direct contact with the packaged product. The sealing liner is the only part of the packaging in direct contact with the packaged content; the aluminium cap serves exclusively to hold the liner in place and to secure the closure to the bottle.

2. Substances of Concern (Article 5)

2.1 General Chemical Compliance

Hazardous substances used in the manufacture of the closures are assessed in accordance with Regulation (EC) No 1907/2006 (REACH), Regulation (EC) No 1272/2008 (CLP) and relevant harmonised European standards. Compliance is confirmed through supplier declarations and internal quality controls.

2.2 Per- and Polyfluoroalkyl Substances (PFAS)

PFAS substances are not intentionally added in any component of the closure, including the aluminium body, printing inks, internal varnish and the sealing liner. This is confirmed by supplier declarations covering all components and supported by analytical testing performed on the sealing liner.

2.3 Heavy Metals

The sum of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (Cr VI) does not exceed 100 mg/kg, in accordance with Regulation (EU) 2025/40 and EN 13695-1. Heavy metals are not intentionally added for functional purposes. Compliance is confirmed by supplier declarations and migration testing performed on the sealing liner.

2.4 Bisphenol A (BPA)

The design of the aluminium closures ensures that the sealing liner – the only part in direct contact with food – is strictly BPA-free. The aluminium cap serves solely to mechanically hold the liner in place, and both the internal varnish and printing inks are BPA-free.

A narrow group of closures may contain small traces of BPA-derived epoxy resin in the varnish applied to the exterior metal surface only, which is not in contact with food. These products comply with the transitional provisions of the applicable Regulation and may be placed on the market until 20 January 2028. Testing and implementation of a fully BPA-free alternative for this exterior coating are currently underway.

3. Packaging Design (Articles 6, 7 and 10)

3.1 Material Efficiency

Packaging is designed and manufactured with consideration for material efficiency and suitability for its intended use. Materials used in production are controlled through approved supplier specifications and internal quality procedures.

3.2 Recycled Content

The aluminium used in production contains 40–74% recycled content, depending on the availability of aluminium scrap on the market. Secondary cardboard packaging contains approximately 74% recycled fibre content and is sourced from FSC-certified suppliers. Sealing liners and bags are manufactured from primary (virgin) plastic material and do not contain recycled content. Recycled-content declarations for the aluminium and cardboard components are provided by the respective raw material suppliers and are available upon request.

3.3 Recyclability

The aluminium component of the closures is fully recyclable within existing European recycling streams. The closure design does not hinder the recyclability of the aluminium body: during the aluminium remelting process, non-metallic components (sealing liner, varnish, printing inks) are burned off, leaving clean aluminium available for recycling. The closure contains no other metal inserts or bonded layers that would contaminate the aluminium melt.

4. Reuse and Refill (Articles 11 and 12)

The supplied closures are single-use components and are not part of a reusable or refillable packaging system. The requirements of Articles 11 and 12 of the PPWR concerning reuse and refill are therefore not applicable to this product.

5. Management Systems

The Manufacturer's quality and environmental management systems are certified to ISO 9001, ISO 14001 and FSSC 22000.

6. Declaration

To the best of the Manufacturer's knowledge, and based on currently available information from approved suppliers and internal specifications, the products covered by this declaration comply with the applicable requirements of the PPWR concerning packaging sustainability, recyclability and material composition.

This declaration is issued in good faith and will be updated in the event of regulatory, technical or material changes.



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