

Declaration of Compliance

Food Contact Material (FCM)

SCOPE

This Declaration of Compliance covers the regulations and standards listed below on stainless steel as an FCM:

- Regulation 1935/2004/EC
- Commission Regulation 2023/2006/EC
- Bekendtgørelse Nr. 681 of 25.05.2020
- DGCCRF Fiche MCDA n°1 (V02 – 01/04/2017)
- NSF/ANSI 51-2021, including US-CFR Title 21 Part 174
- GB 4806.1-2016
- GB 4806.9-2023
- GB 31603-2015
- MERCOSUR/GMC/RES N° 03/92 and MERCOSUR/GMC/RES. N° 46/06
- The Council of Europe Resolution CM/Res(2020)9

All stainless-steel products sold by Dacapo Stainless can be used as an FCM. The same applies for all stainless steel grades sold by Dacapo Stainless; they are suitable for food contact applications according to the DGCCRF “Fiche MCDA n°1 (V02 – 01/04/2017) Food contact suitability of metals and alloys”.

The material certificate according to EN 10204-3.1 for the specific product is an integral part of this compliance documentation as is the product description for the specific item number. All Dacapo Stainless’s products are supplied with a 3.1 material certificate in compliance with EN 10204.

REGIONAL COMPLIANCE

EU/DK

Stainless steel materials covered by this Declaration comply with the requirements in 1935/2004/EC (EU framework regulation on food contact materials) and are manufactured in compliance with 2023/2006/EC (EU regulation on Good Manufacturing Practice, GMP).

The materials also comply with the requirements of the Danish Order on food contact materials and articles: Bekendtgørelse Nr. 681 of 25.05.2020.

The stainless steel complies with 1935/2004/EC by complying with the French national requirements regarding composition of stainless steel, as defined in “*Arrêté du 13 janvier 1976 relatif aux matériaux et objets en acier inoxydable au contact des denrées alimentaires*”, the specification for stainless steel in the DGCCRF “Fiche MCDA n°1 (V02 – 01/04/2017) Food contact suitability of metals and alloys”.

The downstream user should consider the corrosion stability (PREN = Pitting Resistance Equivalence Number) of the specified stainless-steel grade in order to ensure compliance of the finished article under the specified usage conditions.

The Danish Guideline on stainless steel “Fødevarekontaktmaterialer (FKM) af stål, Retningslinjer, Fødevarestyrelsen, september 2018”, gives guidance on PREN values for different applications. We recommend a PREN value of minimum 17.5 for general applications and 23 or higher for aggressive environments.

PREN is calculated as: $PREN = \%Cr + 3,3 \times \%Mo + 16 \times \%N$

We recommend that stainless steel materials intended for food contact applications are ordered with a 3.1 material certificate (EN 10204-3.1).

In addition, the materials comply with the Council of Europe Resolution CM/Res(2020)9, which provides guiding principles for the safe use of metals and alloys in food contact applications, emphasizing risk assessment, good manufacturing practice, and traceability.

USA

Compliance with the EU requirements demonstrates compliance with NSF/ANSI 51-2021 Food Equipment materials, and thus compliance to 1935/2004/EC ensures compliance with US requirements including the general provisions in US-CFR Title 21 §174.

However, the end user must ensure that stainless steel articles with no cutting edge contain at least 16 % Chromium. *Note: martensitic stainless steel should only be used for cutting and grinding tools.*

CHINA

The materials covered by this Declaration comply with the requirements of GB 4806.1-2016 General Safety Requirements for Food Contact Materials and Articles by complying with the requirements regarding stainless steel specified in GB 4806.9-2023 Metal materials in food contact.

The materials covered by this Declaration have been produced in compliance with the requirements for Good Manufacturing Practice specified in GB 31603-2015 General Health Code for Production of Food Contact Materials and Articles.

Martensitic stainless steels are only used for cutting and grinding tools.

This declaration does not cover changes to the materials caused by welding or other treatments by downstream users. When producing finished articles from stainless steel materials, it is the responsibility of the downstream user to choose stainless steel grades that will comply with the migration limits specified in GB 4806.9-2023 when the finished article is tested according to the conditions specified in the standard.

MERCOSUR/MERCOSUL

The materials comply with the requirements set out in Código Alimentario Argentino, MERCOSUR/GMC/RES N° 03/92, and MERCOSUR/GMC/RES. N° 46/06 (metallic food contact materials).

GENERAL REQUIREMENTS

Stainless steel delivered by Dacapo Stainless is suitable for producing utensils and equipment intended for contact with food under conditions that do not exceed the corrosion resistance of the stainless steel grade as defined by its PREN value.

It is the responsibility of the downstream user to ensure that the finished articles comply with the relevant regulations specified above.

Kind regards,



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