

**Polykeg S.r.l.**  
Via Leonardo da Vinci 5/9  
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*Declaration of Conformity N. 1 A*

**DECLARATION OF CONFORMITY OF MATERIALS AND ARTICLES INTENDED TO  
COME INTO CONTACT WITH FOOD**

1. This declaration applies to the products:

**Single-use plastic kegs with BAG models  
PREMIUM, SMART, PRO and PRO 2.0 with a capacity of up to 30 litres  
with A, S, D, G, M and K valves**

**EUROPEAN UNION**

2. We hereby declare that the products supplied for prolonged contact at room temperature or lower for the following drinks:

01.01 - Non-alcoholic beverages or alcoholic beverages of an alcoholic strength lower than 6 % vol.

- A. Clear drinks: water, ciders, clear fruit or vegetable juices of normal strength or concentrated, fruit nectars, lemonades, syrups, bitters, infusions, coffee, tea, beers, soft drinks, energy drinks and the like, flavoured water, liquid coffee extract.
- B. Cloudy drinks: juices, nectars and soft drinks containing fruit pulp, musts containing fruit pulp, liquid chocolate

01.02 - Beverages of an alcoholic strength of between 6% vol. and 20% vol.

01.03 - Alcoholic beverages of an alcoholic strength above 20 % and all cream liquors

07.01 - Milk

- A. Milk and milk-based drinks whole, partly dried and skimmed or partly skimmed

07.02 - Fermented milk such as yoghurt, buttermilk and similar products

**are compliant**

with the following European Community legislation:

- Regulation (EC) No. 1935/04 as amended, in particular article 3, article 11, paragraph 5, article 15 and article 17
- Regulation (EC) No. 1895/05 on epoxy derivatives as amended
- Regulation (EU) No. 10/2011 as amended
- Standard EN 602 regarding the chemical composition of aluminium and aluminium foil used in articles for use in contact with foodstuff



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and the following Italian legislation:

- Italian Ministerial Decree 21/03/73 as amended
- Italian Presidential Decree 777/82 as amended

3. The products intended for direct and indirect contact with foodstuffs cited in section 1 are manufactured from various components, consisting of the raw materials listed in the table below:

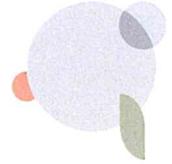
Component	Raw material
Bag	OPA/adhesive/ALU/adhesive/OPA/PE (side in contact with food) LLDPE/ALU/adhesive/OPA/LLDPE (side in contact with food) PE/ALU/OPA/PE (side in contact with food)
Valve	Polyoxymethylene copolymer (POM), Polypropylene (PP), Styrene-ethylene-butylene copolymer (SEBS/TPE), Polystyrene/Polyphenylene ether copolymer (PPE/PS), Rubber (NBR)
Dip tube kit with adapter and end piece for bag	Low density Polyethylene (PE), Polypropylene (PP)
KEG	Polyethylene terephthalate (PET) + masterbatch

4. The raw materials of the various components contain substances subject to restrictions in the aforementioned legislations. The substances subject to specific restrictions are listed in *Annex 1*, which is available on specific request, upon signing of the confidentiality agreement.
5. The overall migration limit, together with the specific restrictions regarding the substances listed in *Annex 1*, the primary aromatic amines, metals and colourings are respected under the conditions of use mentioned in point 2 of the declaration.

**Test conditions for overall migration:**

Simulant	Time and temperature
B: Acetic acid 3% v/v	10 days at 40 °C
C: Ethanol at 20% v/v	10 days at 40 °C
D1: Ethanol at 50% v/v	10 days at 40 °C





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The ratio between the contact surface of the various components and the volume used to determine the conformity of the same ranges from 1 to 2 cm<sup>2</sup>/ cm<sup>3</sup>.

6. There is no Bisphenol A in the product and there are no plans to add this substance to the production process or to the production process of the raw materials as per declarations issued by our suppliers (Reg. (EU) 2024/3190).
7. The materials comprising the various components contain substances governed by Regulation (EC) No.1333/2008 and Regulation (EC) No. 1334/2008 (substances also known as “dual use” additives). According to experimental data and/or theoretical calculations, these substances comply with the provisions of article 11, paragraph 3, letters a and b, of Regulation (EU) no. 10/2011 as amended, and of Italian Ministerial Decree of 21 March 1973.

These “dual use” substances are listed in *Annex 1*.

The user of the material intended for food contact is responsible for informing the undersigned company of any restrictions due to the compositional characteristics (presence of additives and flavourings) of the food product to be packaged.

8. In support of the above, the company declares to have at the disposal of the competent Authority:
  - reports regarding tests carried out on the finished product and
  - other support documentation required pursuant to Regulation (EC) No. 1935/2004, art. 16, paragraph 1.

For compliance with the specific migration limits, the screening approach “Food simulant substitutes” as stated in paragraph 2.2.4 of Annex V of Reg. (EU) no. 10/2011 is used.

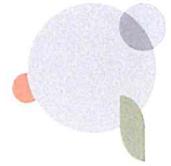
Compliance has been verified on the basis of 1 kg of food coming into contact with 6 dm<sup>2</sup> of product.

9. PolyKeg S.r.l. applies Good Manufacturing Practices and a Quality Assurance System as required by Regulation (EC) No. 2023/2006 “Good manufacturing practices for materials and articles intended to come into contact with food”.

**USA**

1. We hereby declare that the product mentioned in paragraph 1 of this declaration supplied by PolyKeg S.r.l. is suitable for contact with foodstuffs and meets the requirements of US legislation and the Food and Drug Administration (FDA). The products can be used safely during the processing, handling and packaging of foods in compliance with the aforementioned regulation.

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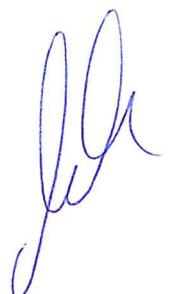
2. On the basis of declarations made by suppliers of the raw materials and on the basis of analyses conducted on the types of materials, the product complies with the standards listed below.

Food and Drug Administration (FDA) Title 21 Code of Federal Regulations:

- FDA 21CFR 177.1520 (Olefin polymers - PP and PE)
- FDA 21CFR 177.1500 (Nylon resins)
- FDA 21CFR 177.2470 (Polyoxymethylene copolymer)
- FDA 21CFR 177.1655 (Polysulphone resins)
- FDA 21CFR 177.1810 (Styrene block polymers)
- FDA 21CFR 177.2460 (Poly(2,6-dimethyl-1,4-phenylene) oxide resins)
- FDA 21CFR 177.1640 (Polystyrene)
- Generally Recognized as Safe (GRAS) regulation (§182-186), GRAS notice, or a self-determination of GRAS through scientific review
- FDA 21CFR 178.3297 (Colorants for polymers)
- FDA 21CFR 177.1630 Polyethylene phthalate polymers
- FDA 21 CFR 177.2600 Rubber articles

For the bag with OPA/adhesive/ALU/adhesive/OPA/PE stratigraphy:

Layer	Standard
PE film (side in contact with food)	FDA 21CFR §§ 177.177.1520(b), (c)2.1, (c)3.1a – Olefin polymers FDA 21CFR § 178.2010 – Antioxidants/stabilisers for polymers FDA 21CFR § 170.189 – Food additives
Adhesive	FDA 21CFR § 175.105 – Adhesives – compliant composition
OPA film	FDA 21CFR §§177.1500 – Nylon resins
Adhesive	FDA 21CFR § 175.105 – Adhesives – compliant composition
ALU film	Although not listed in any specific monograph, aluminium foil is generally recognised as safe (GRAS), and the oils used in its production processes comply with § 178.3910
Adhesive	FDA 21CFR § 175.105 – Adhesives – compliant composition
OPA film (outer side)	FDA 21CFR §§177.1500 – Nylon resins





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For the bag with LLDPE/ALU/adhesive/OPA/LLDPE stratigraphy:

Layer	Standard
LDPE film (side in contact with food)	FDA 21CFR § 177.1520 (Olefin polymers - PE) FDA 21CFR § 178.2010 – Antioxidants/stabilisers for polymers FDA 21CFR § 177.1350 – Ethylene-vinyl acetate copolymers FDA 21CFR § 178.3860 – Adjuvants, production aids, and sanitizers (Release Agents)
ALU film	Although not listed in any specific monograph, aluminium foil is generally recognised as safe (GRAS), and the oils used in its production processes comply with § 178.3910
Adhesive	FDA 21CFR § 175.105 – Adhesives – compliant composition
OPA film	FDA 21CFR §§177.1500 – Nylon resins
LDPE film (outer side)	FDA 21CFR § 177.1520 (Olefin polymers - PE)

For the bag with PE/ALU/OPA/PE stratigraphy:

Layer	Standard
PE 40 µm film (side in contact with food)	FDA 21CFR §§ 177. 1520 (Olefin polymers - PE) FDA 21CFR§ 178. - Antioxidants/stabilisers for polymers Generally Recognised as Safe (GRAS) FDA 21CFR § 175.105 FDA 21CFR § 175.300 FDA 21CFR § 178.2010 FDA 21CFR § 178.3297
ALU film	Although not listed in any specific monograph, aluminium foil is generally recognised as safe (GRAS), and the oils used in its production processes comply with § 178.3910
OPA film	FDA 21CFR §§177.1500 – Nylon resins
Adhesive	FDA 21CFR § 175.105 – Adhesives – compliant composition
PE 25 µm film (outer side)	FDA 21CFR §§ 177. 1520(c)2.1, (c)3.1, (c)3.1a - Olefin polymers FDA 21CFR § 178. Generally Recognised as Safe (GRAS)

We therefore declare that all our packaging and packaging components normally used for products intended for contact with food comply with the requirements of the aforementioned legislation.



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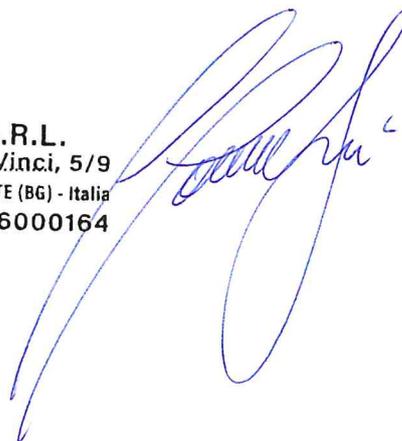
3. The product is also manufactured in accordance with Good Manufacturing Practices (GMP) under FDA Title 21 CFR 174.5 (General provisions applicable to indirect food additives).
4. This declaration cannot be extended to cases in which the product was used for purposes other than those for which it was requested and/or declared suitable by PolyKeg S.r.l. in this declaration, as well as for methods of use other than those listed on the Product Sheet and in the Instruction manual. In this case PolyKeg S.r.l. is relieved of any responsibility and it is up to the end user to check the suitability of the material for the new conditions of use.
5. This declaration is valid from the date shown below and will be replaced if substantial changes are made to the production of the material which may alter certain essential requirements for conformity, or in the event that the legal references above are modified and updated and therefore require new verification for conformity purposes.

Grumello del Monte (BG), 02/02/2026

**Surname and first name:** Sergio Sonzogni

**Role:** Chief Executive Officer

**Signature/ (company stamp):** **POLYKEG S.R.L.**  
Via Leonardo da Vinci, 5/9  
24064 GRUMELLO DEL MONTE (BG) - Italia  
P. IVA/C.F. 03766000164

A handwritten signature in blue ink, appearing to read 'Sergio Sonzogni'.