

May 24, 2024

Compliance Statement for Materials of Construction in Steel Drums – North Coast Containers (NCC)

FOOD SAFETY. North Coast Container's (NCC) steel drums are made from materials that when used as intended with the filled product may be considered in compliance with the Federal Food, Drug and Cosmetic Act and the applicable FDA regulations. The filler is responsible for determining the suitability and use limitations of the container and its components, as well as manufacturing process assessment and cleanliness, for the given application. Contact your NCC sales representative to arrange for your evaluation of our manufacturing facilities.

The product contact materials of these containers, as specified to our suppliers, are indirect food additives that are either generally recognized as safe (GRAS), prior sanctioned, permissible by regulation under the Food Additives Amendment to the Federal Food, Drug & Cosmetic Act (21 CFR), or permissible by Food Contact Notification (FCN).

The finished (cured) interior linings meet the requirements of the US Food and Drug Administration 21 CFR Part 175.300 for packaging, processing, or holding food. The finished interior linings meet the requirements as set forth in the EU regulations (EC) 1935/2004 on the use of coatings for food packaging. Correlation of GMP Regulation (EC) 2023/2006 with regulations under US FDA jurisdiction is generally accepted in the US. Migration testing for determination of use limitations is the responsibility of the filler.

The correlation between US FDA food packaging requirements and those of the Canadian Food Inspection Agency (CFIA) is generally recognized. Because of the compliance of our steel drum materials to US FDA requirements, and because of the known correlation, the drums are compliant with Health Canada Division 23 of the Food and Drugs Act and Regulations, Section B.23.001, although please note that no "Letter of No Objection" has been obtained.

Most closures and gasketing systems for closures comply with FDA regulations 21 CFR 177.1520 and 21 CFR 177.2600. Flanges with black "Buna" gaskets do not have a direct route to FDA compliance. Vented closures that utilize microporous membranes, i.e. fluoropolymer membranes, do not have a direct route to FDA compliance. Certain vented closures, as designed with splashguards to minimize liquid contact with the vent material, are available for your determination as having a functional barrier between the filled product and the vent material. Other routes to compliance for such vents may include dietary exposure calculations that you can perform for your specific product. Contact your NCC sales representative for samples of closure, valve, gasket or vent materials for your own internal testing needs and determinations.

Cold rolled unlined steel may be considered GRAS based on their chemical inertness, hardness, and a history of safe use in contact with food.

SHELF LIFE. The useful shelf life of an unfilled steel drum is dependent on conditions of storage, top load, and temperature changes that may impact the container performance. This shelf-life is based on the potential for other uncontrolled storage conditions to affect the exterior integrity of the drum. The filler is responsible for inspecting and evaluating the drum for final determination of use.

BSE/TSE, RELIGIOUS REQUIREMENTS. All the product contact materials of construction used in the manufacture of steel drums are not known to have animal derivation, and therefore (a) meet the requirements of Kosher and Halal, and (b) are not anticipated to contain any bovine spongiform encephalopathy agents.

CONEG/CALIFORNIA TOXICS IN PACKAGING. The raw materials of construction for steel drums are purchased as industry standard materials. Suppliers to NCC have the responsibility to meet the requirements in our specifications for compliance with CONEG Model Legislation, California Toxics in Packaging Legislation, and the Toxics in Packaging Clearinghouse. These requirements include heavy metal sum concentrations not to exceed 100 ppm. NCC does not intentionally add any such substances in its converting process of the raw materials of construction. Compliance with the above Legislation correlates with (a) EU RoHS requirements for heavy metals and (b) EU Packaging Directive 94/62. The filler is responsible for container and component suitability, source separation and recycling/disposal issues in each applicable country of use.

REACH. NCC packaging and containers manufactured in North America are considered articles that are exempt from REACH registration, as there is no intended release or reasonably foreseeable release of any substances used in construction of the articles during the service life of the article. It is the importer of products into REACH countries that has the responsibility to assess and fulfill REACH registration requirements. NCC North America has no further responsibility to address REACH registration requirements.

We are not aware of any substances of very high concern (SVHC's) in the steel drums manufactured in North America, with the exception of certain nitrile (Buna) gasket systems. Such gaskets may be derived from phthalates, which are included on the SVHC list. In addition, we do not intentionally add any SVHC's in our manufacturing process.

DELETERIOUS SUBSTANCES. NCC is not aware of the presence of, nor do we intentionally add, any of the following substances to our product or include in our process: polycyclic aromatic hydrocarbons (PAHs), quaternary ammonium compounds, melamine, benzophenone, chlorinated compounds, polybrominated biphenyls or polybrominated diphenyls, PVC, PVDC, fumigants, pesticides, preservatives, biocides including dimethylfumarate, perfluorooctane sulfonates or perfluorooctanoic acid, per- and polyfluoroalkyl substances (PFAS), latex, common food allergens (including peanuts, tree nuts, wheat, fish, crustaceans, soy, milk, eggs, sesame) and nitrosamines. We do not intentionally add genetically modified organisms (GMO's).



BISPHENOL A (BPA). Bisphenol A is generally contained in certain raw materials used in epoxy and epoxy/phenolic formulations used as linings for some steel drums and steel closure systems. NCC purchases these raw materials as industry standard materials and does not deliberately add Bisphenol A in its converting process of these items. Phenolic based resins used for drum linings do not have BPA as a starting component. Contact your NCC sales representative for more information regarding your specific product.

CALIFORNIA PROPOSITION 65. The steel drums supplied to you do not, as a result of our manufacturing processes, require any warnings to be made regarding chemicals listed in the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65).

Refer to published terms, conditions of sale, and limitations of liability that govern all sales. Those terms and conditions include all the above statements. Customers must make their own determination that use of our product is safe, lawful, and technically suitable for their intended application.

Dave Schlarb
Corporate Quality Leader