## Food Contact Suitability Information within the framework of the Regulation (EC) No 1935/2004:
Prepainted steel “Granite Standard®” used as cold rooms panels

Within the framework of the European legislation (notion of positive lists) on food contact suitability *(permanent and repetitive contact)*, no certificate of food contact suitability for the Granite Standard® product can be delivered. In fact, for materials in direct contact with foodstuffs, **all the layers must be “Food Contact’ suitable”.**

However *(case of accidental contact)*, some global and specific migration tests (Inertia tests) have been done to assess the inertia of the prepainted steels (see page 2):
- The global and specific migration results obtained in mediums simulating the aqueous, the fat and the alcoholised contacts show a good inertia of the prepainted steels
- The only issue concerns the migration of zinc in case of acid contact so our recommendation is the following: **Do not use acidic cleaning products for the durability of the prepainted steel.**

### Sources:

- **European legislation**
  - Guidelines of the Council of Europe (update on going): Technical document: Guidelines on metals and alloys used as food contact materials (09.03.2001). Alloys for food contact should contain only aluminium, chromium, copper, gold, iron, magnesium, manganese, molybdenum, nickel, platinum, silicone, silver, tin, titanium, zinc, cobalt, vanadium and carbon.
  - Due to the lack of specific regulations on paints, the Directive 2002/72/CE (and its amendments) on plastic materials and the inventory of Resolution AP (2004) 1 of the Council of Europe relative to varnishes are used as positive list for paints.

- **German legislation**
  - “Lebensmittel-, Bedarfsgegenstände und Futtermittelgesetz” (Consumer Goods Law, LMBG)

- **French legislation**
  - Material Sheets edited by the DGCCRF: Steel and Stainless steel with organic coating (excluding packaging steels)
  - French standard NF A 36-713 edited by the French “Bureau de Normalisation de l’Acer: BNAcier”: Unpackaged steels – Flat steel products intended to come into contact with foodstuffs, products and beverages for consumption by man and animals – Steel with organic coating.
  - In France, the new modification of the Guideline for “materials specifications” published by the DGCCRF removes cold rooms from the classification ‘likely to come into contact with unpackaged food’. “The organically coated steels used for the following applications are not covered by the provisions set out in this specification:
    - The external housings of household electrical appliances;
    - Suspended ceilings and hoods;
    - Internal room partitions and their finishes;
    - The inside parts of cold rooms and refrigerated or insulated trucks”

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1 Direction Générale de la Concurrence, de la Consommation et de la Répression des Fraudes - French equivalent to the US Food and Drug Administration
Migration tests on the final product, performed by French laboratory (LNE)

- **Global**
The tests results in mediums simulating the aqueous (distilled water; 10 days at 5°C), the acid (acetic acid, 10 days at 5°C), the fat (isooctane and ethanol 95%, 10 days at 5°C) and the alcoholised (Ethanol 10%, 10 days at 5°C) contacts are lower than the limit of Global Migration of 10mg/dm² (= 60 mg/kg) fixed by the regulation, showing global inertia of prepainted steel.

- **Specific Migration** tests on zinc, iron, chromium, hexavalent chromium
  - **Aqueous contact** (10 days at 5°C)
    - Distilled water: Zinc, iron, chromium and hexavalent chromium migrations are very low and not significant.
    - Ethanol 10%: Zinc, iron, chromium and hexavalent chromium migrations are very low and not significant.
    - Acetic acid:
      - Chromium and hexavalent chromium migrations are very low and not significant.
      - Iron migration is very low (<0.12 mg/dm²)
      - Zinc migration: results are scattered and can reach the limit of 1.5 mg/dm² fixed by the DGCCRF but are lower than the limit of 4 mg/dm² fixed by the Directive 2005/79/EC (applying the default factor 6).
  - **Fat contact** (sunflower oil, 10 days at 5°C)
    - Zinc, iron, chromium and hexavalent chromium migrations are very low and not significant.
  - **Dry contact** (wheat flour, 10 days at 5°C)
    - Zinc, iron, chromium and hexavalent chromium migrations are very low and not significant.

Contacts

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