

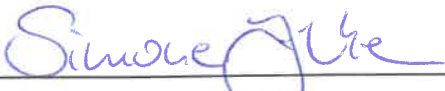
Declarations of Conformity

Sulphur dioxide

Food Quality

Substance name: Sulphur Dioxide
Chemical Formula: SO₂
IUPAC-Name: Sulfur dioxide
Food additive: E 220
Molar mass: 64.0638
CAS-No: 7446-09-5
EC No (EINECS/ELINCS): 231-195-2
HS-Code: 2811 29 05
Country of Origin: Germany
Application: For use as a food additive in the European Union (EU)
(Food Quality)

Gültige Fassung

This document is valid until: 31.12.2027	
Date: 31.05.2022	Date: 03.06.22
Prepared by	Approved by
	
Simone Jülke – Secretariat R & D, IMS	Dr. Ingo Biertümpel - Head of R & D / Integrated Management Representative

Declarations of Conformity (DOC)

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Newly added items are highlighted in yellow.

1. DECLARATION OF ALLERGEN-STATUS

Based on the above mentioned information we hereby declare that **sulphur dioxide** is allergen-free (with the exception of **Sulphur dioxide** and sulphites (ALBA25))

Allergens (Annex II of Regulation 1169/2011/EC)	Present Yes/No
Cereals containing gluten, including wheat, rye, barley, oats, spelt, and kamut or their hybrids	No
Crustaceans and –derived products	No
Eggs and –derived products	No
Fish and –derived products	No
Peanuts and –derived products	No
Soybeans and –derived products	No
Milk and –derived products	No
Nuts and –derived products, namely almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios, macadamia and Queensland nuts	No
Celery and –derived products	No
Mustard and –derived products	No
Sesame seeds and –derived products	No
Sulphur dioxide and sulphites at concentrations greater than 10 mg/kg or 10 mg/liter	YES
Lupin and –derived products	No
Molluscs and –derived products	No
Intolerance Substances (ALBA)	Present Yes/No
Beef (ALBA09) & products thereof	No
Carrot (ALBA34)	No
Chicken (ALBA11) & products thereof	No
Cocoa (ALBA15)	No
Coriander (ALBA31)	No
Glutamate (ALBA24)	No

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Legumes & Pulses (ALBA17)	No
Maize (ALBA14)	No
Monosodium Glutamate (MSG)	No
Pork (ALBA10) & products thereof	No
Synthetic Colours including Azo dyes	No

2. STATEMENT – RAW MATERIAL ORIGIN

We hereby declare that no material of any animal or human or plant origin is used within the production of **sulphur dioxide** and that **sulphur dioxide** is never, at any time, put in contact with a biological product, the primary packaging included.

The starting materials for the production of **sulphur dioxide** are of mineral origin.

Starting materials: sulphur, sulphur oxides, sulphuric acid

Solvent(s): -

Catalyst: -

Additives: -

Miscellaneous: -

3. NON-GMO DECLARATION

Sulphur dioxide produced by Grillo is the result of traditional processing methods, which do not involve the use of genetic modification techniques that lead to genetically modified organisms as defined in Directive 2001/18/EC on the deliberate release into the environment of genetically modified organisms.

For the processing of our product **sulphur dioxide** we do not use any genetically manipulated organisms (GMO)¹ nor any GMO derivatives².

¹ Genetically modified organism according to the definition of regulation 2001/18/EC of 12 March 2001 on the deliberate release into the environment of genetically modified organisms and repealing Council Directive 90/220/EEC and Regulation (EC) 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed as well as Regulation (EC) 1830/2003 of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labeling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC.

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² Any substance which has been produced with the help of GMO, but does not contain any.

4. BSE/TSE DECLARATION

Bovine Spongiform Encephalopathy (BSE) /
Transmittable Agents of Animal Spongiform Encephalopathy (TSE)

No material used in the manufacture of sulphur dioxide is of bovine or of any animal origin (either whole or part). In addition, the equipment used to manufacture sulphur dioxide is not used to produce any products of bovine or of any animal origin. Therefore, based upon knowledge of the manufacturing process and the raw materials utilized, the transmission of BSE/TSE via the product line listed above is not expected to occur.

5. ADDITIVE DECLARATION

We hereby declare, that sulphur dioxide produced by GRILLO is free of preservatives, colours, anti-oxidants, emulgators, thickening agents and flavor enhancers.

6. ENVIRONMENTAL CHEMICAL DECLARATION

We hereby certify, that sulphur dioxide produced by GRILLO does not contain any of the following chemicals regulated as

Volatile Organic Chemicals or Materials (VOC/VOM),

Hazardous Air Pollutants (HAPs),

Extremely Hazardous Substances (EHS),

CERCLA Hazardous Substances (HS),

EPCRA §313 or

NPRI Toxic Chemicals,

State specific air toxic chemicals.

Alkylphenolethoxylates (APEO)

7. PFOA/PFOS-DECLARATION

PFOS (Directive 2006/122/EC)

PFOA (Directive 2006/122/EC)

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We hereby declare, **sulphur dioxide** produced by GRILLO is free of perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS), their salts or compounds which could degrade into PFOA or PFOS

8. ORGANOTIN-DECLARATION

We hereby declare, that **sulphur dioxide** produced by GRILLO is free of Organotin compounds such as Monobutyltin (MBT), Dibutyltin (DBT) and Tributyltin (TBT). Further, none of the raw materials is specified by its supplier to contain any of the above mentioned substances as an impurity.

9. PHTHALATE-DECLARATION

We hereby declare, that **sulphur dioxide** produced by GRILLO is free of Phthalates, in particular also free of Dibutyl phthalate (DBP), Diethyl phthalate (DEP), Diisononyl phthalate (DINP),

Diethylhexylphthalate (DEHP), Di -isodecyl phthalate (DIDP), Di -n-octyl phthalate (DNOP) and Benzylbutylphthalate (BBP). Further, none of the raw materials is specified by its supplier to contain phthalates as an impurity.

10. EPOXY-DECLARATION

We hereby declare that **sulphur dioxide** produced by GRILLO is free of BADGE (Bisphenol A diglycidyl ether), BFDGE (Bisphenol-F diglycidylether), NOGE (novolac glycidyl ethers) and some

of their derivatives (see Directive 2004/13/EC on the use of certain epoxy derivatives).

11. PCB-DECLARATION

We hereby declare that **sulphur dioxide** produced by GRILLO is free of polybrominated biphenyls (PBB), polybrominated diphenyl ether (PBDE) and polychlorinated biphenyls (PCB). Further, none of the raw materials is specified by its supplier to contain PBB, PBDE or PCB as an impurity.

12. FORMALDEHYDE-DECLARATION

We hereby declare, that sulphur dioxide produced by GRILLO is free of Formaldehyde.

13. Declaration of Conformity with RoHS-Directive 2002/95/EC

We declare under our sole responsibility that **sulphur dioxide** produced by GRILLO is in conformity with the following EC-directives:

2002/95/EC

2003/11/EC

We herewith confirm that **sulphur dioxide** complies with the requirements of the directive 2002/95/EC (27. January 2003) and 2003/11/EC (06. February 2003) on the restrictions of the use of certain hazardous substances in electrical and electronic equipment. We confirm that **sulphur dioxide** does not contain Deca-BDE (deca brominated diphenyl ethers) and therefore **sulphur dioxide** is in accordance with the latest RoHS guidelines.

14. DECLARATION OF IRRADIATION-STATUS

We confirm that **sulphur dioxide** produced by GRILLO is not treated by any ionising radiation. **Sulphur dioxide** must not be labelled according to CH-LKV as well as regulation (EG) No.13/2000.

15. DECLARATION OF SOLVENT-FREE PRODUCT

according to guidelines CPMP/ICH/283/95 (Guideline for Residual Solvents) and CVMP/VICH/502/99 (Guideline on Impurities: Residual solvents)

For the production of **sulphur dioxide** neither solvents of the classes 1, 2 or 3 are used nor does **sulphur dioxide** come in contact with those.

16. DECLARATION OF MYCOTOXIN- STATUS (401/2006/EC)

We confirm that our **sulphur dioxide** produced by GRILLO does not contain any secondary metabolites of mould (mycotoxins - Aflatoxins, Ochratoxin A, Patulin, Fusarium toxins). Our product **sulphur dioxide** contains neither allergens nor components of animal or plant origin. During the production process no components of animal or plant origin are used.

17. ANIMAL NON-TESTING DECLARATION

according to Position of the German Chemical Industry Association (Verband der Chemischen Industrie e. V. - VCI) on self-commitments as an instrument in environmental and consumer protection policies "Commitment not to use animal testing for finished cosmetic products and publication of a guideline on alternative methods (1989/92)"

We hereby confirm that **sulphur dioxide** produced by GRILLO has not been the subject of animal testing or retesting for cosmetic purposes by or on behalf of Grillo since December 31st 1990.

DEFINITIONS TO TEXT ABOVE.

1. Animal testing for cosmetic purposes - any animal test or retest carried out on a material for the specific purposes of generating data to support efficacy or for safety when formulated into a cosmetic product for application to the human body or if undertaken to achieve positive listing as a cosmetic ingredient in the European Union or in other countries (for example as a preservative).
2. The term 'Animal' is as defined by the 1986 Animals (Scientific Procedures) Act UK.
3. The term 'Cosmetic product' is as defined by article 1(1) of the European Union Cosmetics Directive 76/768/EEC as amended.

18. ABSENCE OF DOPING SUBSTANCES

We hereby declare that **sulphur dioxide** does not contain any of the substances listed in the "Official list of prohibited doping substances 2020 (see <https://www.wada-ama.org/en/media/news/2019-09/wada-publishes-2020-list-of-prohibited-substances-and-methods>)" issued by the World Anti-Doping Agency. Furthermore a cross-contamination with any of the substances listed in the above mentioned list can be ruled out.

19. NON-NANOTECHNOLOGY-STATUS

Sulphur dioxide produced by Grillo is the result of traditional processing methods, which do not involve the use of nanotechnological techniques that lead to nanoparticles (by definition, particles or droplets with sizes below 100 nm are called nano-scaled particles).

20. DECLARATION OF PCDD/F-STATUS

We hereby declare that sulphur dioxide does not contain dioxins.

21. OZONE DEPLETING SUBSTANCE (ODS) DECLARATION

Sulphur dioxide does not contain and are not manufactured with any Class I or Class II ODS as defined in 40 CFR Part 82. Consequently, Sulphur dioxide does not require U.S. ODS warning labels.

22. PRODUCT DECLARATION – CALIFORNIA PROPOSITION 65

Sulphur dioxide does not contain any substance listed pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) in an amount that would require a warning to Buyer's employees or others using the product.

	Sulfur dioxide
California Prop 65 Known Carcinogens	Not listed
CA Prop 65 Developmental Toxin	Not listed
CA Prop 65 Female Reproductive Toxin	Not listed
CA Prop 65 Male Reproductive Toxin	Not listed

23. DECLARATION OF CONFORMITY WITH DIRECTIVES 10/2011/EC (PACKAGING MATERIAL)

The shipment of sulphur dioxide and the packaging materials and articles such as bottles and containers will be made in accordance with the relevant requirements arising from the applicable EU legislation or national legislation, especially framework regulation 1935/2004/EC, directive 2023/2006/EC on good manufacturing practice and the "plastics directive" 10/2011/EC with subsequent amendments.

24. -

25. EUROPEAN UNION REACH COMMUNICATION

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Grillo has established a process to address requirements under the European Union's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation.

26. ABSENCE OF 3-MCPD, INORGANIC TIN AND BENZO(A)PYRENE (333/2007/EC)

We confirm that our **sulphur dioxide** produced by GRILLO does not contain inorganic tin, 3-MCPD (3-monochloropropane-1,2-diol) and benzo(a)pyrene. Our product sulphur dioxide contains neither allergens nor components of animal or plant origin. During the production process no components of animal or plant origin are used.

27. ABSENCE OF PAHs (POLYCYCLIC AROMATIC HYDROCARBONS)

We hereby declare that **sulphur dioxide** does not contain any PAHs (polycyclic aromatic hydrocarbons). The International Agency for Research on Cancer (IARC) classified the PAHs as follows:

Naphthalene	Possibly carcinogenic to humans
Acenaphthylene	-
Acenaphthene	-
Fluorene	Not classifiable as to carcinogenicity to humans
Phenanthrene	Not classifiable as to carcinogenicity to humans
Anthracene	Not classifiable as to carcinogenicity to humans
Fluoranthene	Not classifiable as to carcinogenicity to humans
Pyrene	Not classifiable as to carcinogenicity to humans
Benzo[a]anthracene	Probably carcinogenic to humans
Chrysene/Triphenylene	Not classifiable as to carcinogenicity to humans
Benzo[b]fluoranthene	Possibly carcinogenic to humans
Benzo[k]fluoranthene	Possibly carcinogenic to humans
Benzo[a]pyrene	Probably carcinogenic to humans
Indeno[1,2,3-c,d]pyrene	Possibly carcinogenic to humans
Dibenz[a,h]anthracene	Probably carcinogenic to humans
Benzo[g,h,i]perylene	Not classifiable as to carcinogenicity to humans

28. STATEMENT PROCESS VALIDATION

Process validation is part of the integrated requirements of our quality management system. It is conducted in the context of a system including design and development control, quality assurance, process control, and corrective and preventive action.

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A process validation report has not been prepared, since the production of **sulphur dioxide** is a well-established process (best available technique) that has been used by Grillo for several decades.

29. MELAMINE AND OTHER COMPOUNDS

We confirm that our **sulphur dioxide** produced by GRILLO do not contain the following substances

- Melamine
- Cyanuric acid
- Natural Rubber Latex
- Dimethylfumarate
- Triclosan
- Chlorinated Paraffins
- SCCP (Chlorinated paraffin short chain)
- ESBO (Epoxidised Soybean Oil)
- Starch

We also declare that neither the said substances are intentionally added during the production of **sulphur dioxide** nor are they used, directly or indirectly, in the production process itself.

30. SVHCs, CMR, PBTs or vPvB – Declaration

We herewith confirm, this product produced by GRILLO

- does not contain any substances of very high concern (see: Candidate List of Substances of Very High Concern for Authorisation (published in accordance with Article 59(10) of the REACH Regulation)). The list can be viewed at <http://echa.europa.eu/web/guest/candidate-list-table>
- does not contain any persistent, bioaccumulative (PBT) and toxic substances as well as any very persistent, very bioaccumulative and very toxic substances (vPBT) according to Regulation 465/2008 EC
- does not contain any carcinogenic, mutagenic or toxic to reproduction (CMR), meeting the criteria for classification in category 1 or 2 in accordance with Directive 1272/2008.

31. CURRENT GOOD MANUFACTURING PRATICE (CGMP)

All grades of sulphur dioxide produced by GRILLO was manufactured by GRILLO using the current Good Manufacturing Practices (cGMP).

32. -

33. FUKUSHIMA INCIDENT DECLARATION

In the context of the European Regulation 297/2011 following the accident at the Fukushima nuclear power plant station on 11th March 2011, we hereby declare that no material used in the manufacture of sulphur dioxide are originating in or consigned from Japan.

34. -

35. QUATERNARY AMMONIUM COMPOUNDS (QAC) DECLARATION

Quaternary ammonium compounds (QAC) are surface active substances containing a quaternary cationic nitrogen atom, substituted by alkyl chains of varying length.

We hereby declare that sulphur dioxide produced by GRILLO is free of Didecyldimethylammonium chloride (DDAC) and Benzalkonium chloride (BAC).

36. JATROPHA DECLARATION

As part of the biodiesel fuel production process, oil is extracted from the Jatropha plant. This oil contains a portion of the toxic compounds; however, the toxic compounds are retained in the glycerin and protein co-products.

To clarify our products do not contain compounds from the Jatropha plant. This includes:

- the sources of our raw materials
- the sources of our "food grade" lubricants
- the sources of other additives

37. -

38. DUAL-USE-DECLARATION

Sulphur dioxide produced by GRILLO is not included in the list of dual use items and technologies referred to in Council Regulation (EC) No. 1334/2000 and its amendment Council Regulation (EC) No. 1183/2007.

Sulphur dioxide neither falls under ITAR (International Traffic in Arms Regulations) restrictions nor under the Wassenaar Arrangement (on Export Controls for Conventional Arms and Dual-Use Goods and Technologies).

We declare that our products are neither EAR99 classified, nor require an ECCN (Export Control Classification Number). An EAR99 classification indicates that a particular item is subject to the Export Administration Regulations (EAR), but but does not require an export license because it is not listed with a specific Export Control Classification Number (ECCN) on the Commerce Control List (CCL) (Supplement No. 1 to Part 774 of the EAR).

39. CONFLICT MINERALS POLICY STATEMENT

Minerals mined in the Democratic Republic of Congo (DRC) and adjoining countries may be making their way into the electronics industry supply chain. Some mining operations in the DRC have been linked to poor labor and environmental practices, and there is evidence that some mining and transportation of minerals in the Eastern provinces of the Democratic Republic of Congo (DRC) are funding conflict in the country by funding illegal armed groups. As part of the Dodd-

Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) passed legislation which requires U.S. companies to report on the origin of these conflict minerals including tin, tantalum, tungsten and gold.

Grillo complies with all national and other applicable laws and regulations. As a consequence, we are committed to keeping our supply chain free from conflict minerals which are covered by laws and regulations concerning the sourcing of minerals from conflict areas. Based on currently available information, Grillo does not use conflict minerals originating in the Democratic Republic Congo (DRC) and its adjoining countries.

40. –

41. –

42. GRAS (generally recognized as safe)

Sulphur dioxide is classified GRAS (generally recognized as safe) by the US FDA (**21 CFR Section: 182.3862**)

This substance is generally recognized as safe when used in accordance with good manufacturing practice, except that it is not used in meats; in food recognized as a source of vitamin B1; on fruits or vegetables intended to be served raw to consumers or sold raw to consumers, or to be presented to consumers as fresh.

43. Zero Discharge of Hazardous Chemicals Programme

In the Zero Discharge of Hazardous Chemicals (ZDHC) Joint roadmap, ZDHC Brands committed to define and develop a Manufacturing Restricted Substances list (MRSL) for the apparel and footwear industry. The ZDHC MRSL is a list of chemical substances subject to a usage ban. You can see the latest version: <http://www.roadmaptozero.com/>

We hereby declare, that **sulphur dioxide** complies with the requirements of the Manufacturing Restricted Substances list (MRSL) including Chapter 1: MRSL for Textiles and Synthetic Leather Processing and Chapter 2: MRSL for Leather Processing.

44. Cosmetic Regulation (EC 1223/2009)

We hereby declare that this product does not contain any of the substances listed in Annex II "List of substances prohibited in cosmetic products" of the regulation (EC) No 1223/2009 of the European Parliament and of the European Council of 30 November 2009 on cosmetic products.

CONTACT

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HACCP-Representative:

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Hereby we,
Grillo-Werke AG
Chemicals Division
Weseler Straße 1
47169 Duisburg

declare that we will inform the Authorities, the certification bodies as well as our customers immediately of all important changes in the management system, in the production process, in the testing of finished products or in the specification of our products.

We invite our customers to perform full audits on our facility, procedures and integrated management system.

The above particulars do not release the customer from the obligation to carry out an inspection of goods received on arrival.

Emergency telephone (in case of poisoning)

InfraServ GmbH & Co. Höchst KG, Frankfurt, Germany

Telephone: **+49 69 3056418** (24 hrs/day in German and English)

Emergency telephone (in case of product recall actions)

Grillo-Werke AG, Duisburg, Germany

Telephone: **+49 203 5557-201** (24 hrs/day)

Telephone: **+49 203 5557-297** (Office hours are Monday to Friday, 9 (a.m.)
to 5 (p.m.) (Central European Time))