

	Supplier Declaration of Compliance for Stainless steel food contact articles	Page:1 of 4 Applicable to: Suppliers
	Version 1, 14.01.2026 JJS	Effective date/ Approved by

1	Name and address of supplier And of the manufacturer if this is not the supplier.	<u>Supplier</u> Company name <u>Dragonwind International Limited</u> Address <u>11/F., The Rays, 71 Hung To Road, Kwun Tong, Kowloon, Hong Kong</u> City & ZIP _____ Country <u>Hong Kong</u> Company id no. /code : _____ <u>Manufacturer</u> Company name <u>Sunlife</u> Address <u>YangJiang</u> City & ZIP <u>YangJiang</u> Country <u>China</u> Company id no. /code : _____
2	Identification of product: • Product name, • Description • Materials (specify steel grade) • Photo	• 25401 BBQ Tools (3 pc.) • 25402 Burger Presser • Material : Stainless Steel 430  

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3	<u>General EU compliance:</u> The articles comply with 1935/2004/EC, Article 3, 11(5), 15 and 17 (EU framework regulation on food contact materials), and the articles are manufactured in compliance with 2023/2006/EC (EU regulation on Good Manufacturing Practice, GMP)
4	<u>Compliance with EU requirements:</u> The finished articles comply with 1935/2004/EC by complying with one, or more, of the requirements mentioned below: ☐ The French national requirements regarding composition, as defined in “Arrêté du 13 janvier 1976 relatif aux matériaux et objets en acier inoxydable au contact des denrées alimentaires”, <i>NOTE: Minimum Cr content 13%, and/or</i> ☐ The Italian national requirements as defined in “Decreto del Ministro della sanità 21 marzo 1973, recante: Disciplina igienica degli imballaggi, recipienti, utensili, destinati a venire a contatto con le sostanze alimentari o con sostanze d’uso personale” with later amendments (composition and specific release limits) <i>NOTE: AISI 201 not permitted, and/or</i> ☒ The Council of Europe (CoE) “Technical guide on metals and alloys used in food contact materials and articles” released on the 30th of September 2013 (<i>NOTE: specific release limits only, as no compositional requirements are defined</i>) <u>Compliance with UK requirements:</u> The articles comply with the UK requirements as specified in “The Materials and Articles in Contact with Food (England) Regulations 2012 (UKSI 2012 No. 2619)” <i>NOTE: Compliance with the French, Italian or CoE requirements will ensure compliance with UK requirements</i> <u>Compliance with US requirements:</u> Compliance with the EU requirements demonstrates compliance with NSF/ANSI 51-2023 Food Equipment materials, and thus compliance to 1935/2004/EC ensures compliance with US requirements. <i>NOTE: articles with no cutting edge must contain at least 16% Chromium.</i>

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4	<u>Usage conditions and restrictions:</u> The articles covered by this DoC are intended to be used for: The articles covered by this DoC have the following restrictions on their use: ☒ Max. usage temperature <u>100</u> °C ☒ Max. contact time at max. usage temperature <u>2</u> <u>hours</u> days/months ☐ Other (describe): _____ The articles covered by this DoC are intended to be used with: ☒ All types of food Or (tick the relevant box(es)) ☐ Aqueous foods for which simulant A is specified and/or ☐ Acidic foods (<4.5 pH) for which simulant B is specified and/or ☐ Alcoholic foods with up to 20 % alcohol by volume, and other foods for which simulant C is specified and/or ☐ Milk products and alcoholic foods for which simulant D1 is specified and/or ☐ Fatty foods for which simulant D2 is specified and/or ☐ Dry foods for which simulant E is specified	
5	Documentation that must be attached: • A Declaration of Compliance from the producer of the items, with the same content as this DoC, if the supplier is not the producer (<i>may be anonymized</i>), and • Test reports, or • Traceable material certificate for metals, including Pb, Cd and As content.	Samples of the product, or a similar product made from the same raw materials and under the same conditions, have been tested according to the test conditions specified in the relevant guidelines and/or regulations specified by us above. We declare that the products in this consignment have been produced under the same conditions as the sample, and from identical raw materials from the same suppliers. We declare that we have procedures in place, according to 2023/2006/EC, to ensure that all items produced live up to the requirements mentioned above.

Date, Signature and Stamp of the Manager



Signature

2026.02.04

Date

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ANNEX 1: Limit values and test conditions for metallic food contact materials

NOTE: If compliance is based on the French requirements for stainless steel, no migration testing is necessary. Instead, the alloy must fulfill the compositional requirements, and the alloy must be fit for purpose, meaning that it must not corrode when used as intended.

Migration Limits	Italy	France composition only	COE 2013
Global, in mg/dm²	8		none
Specific migration/release limits in mg/kg of foodstuff <i>NOTE: the parameters marked in yellow are standard parameters. The release of metals depends on the composition of the metal, the surface roughness, and the environment. Testing of release may not be necessary if the composition is well documented, and the alloy has previously been documented for similar applications, with the same, or higher, surface roughness.</i>			
Aluminium			5
Antimony	none		0.04
Arsenic	1		0.002
Barium			1.2
Beryllium			0.01
Cadmium	0.1		0.005
Chromium	0,1		0.250
Cobalt	4		0.02
Copper	50		4
Iron			40
Lithium	none		0.048
Lead	1		0.010
Manganese	0.1		1.8
Mercury			0.003
Nickel	0.1		0.14
Thallium			0.0001
Tin			100
Vanadium	none		0.01
Zinc			5
Compositional limits <i>note that compliance with the French compositional requirement does not automatically ensure compliance with the specific release limits in Italy and the COE Guide. The French compositional requirements are based on the use of steel grades that are fit for the intended use, based on corrosion stability.</i>			
Arsenic		0,03	
Cadmium		0,01	
Lead		0,05	

Test Conditions for Italy, Global and specific migration	
Test media B	3% acetic acid
Temperature	100 C
Time	30 min.
Number of cycles	Up to 3

Note: The testing requirements, set out in the CoE Guide, differ markedly from the Italian requirements, and the release data are only relevant if the relevant tests have been used. Consult the guide for the relevant testing requirements.