

EU Conformity Declaration for Frylow | Save Fry-Oil

UEB2302636
03/14/2023



Company Pacific Alliance
International Marketing Ltd
3358 Ravenwood Rd.
CND V9C 2X4 Victoria, BC

UEB2302636 Text for declaration of conformity for FRYLOW

Fill-in aids:

Original documents available in EURLEX

<http://eur-lex.europa.eu/homepage.html?locale=de>

- Regulation (EG) No. 1935/2004 or Food Contact Materials (= FCM)
Framework regulation: applies to all types of materials and articles intended to come into contact with food <http://eur-lex.europa.eu/legal-content/DE/TXT/?qid=1479118021428&uri=CELEX:02004R1935-20090807>

§ Article 3 describes the general requirements:

General Requirements

(1) Materials and items, including active and intelligent materials and items, shall be manufactured in accordance with good manufacturing practice so that they are below normal or foreseeable conditions of use
Dispose of food in quantities that are likely to a) endanger human health, or

b) an unacceptable change in the composition of the bring in food
or

c) bring about an impairment of the organoleptic properties of the food.

2. The labelling, advertising and presentation of the materials and objects shall not mislead the consumer.

§ Article 15 contains labeling requirements applicable to products that have not yet been in contact with food:

Frylow

UEB2302636

03/14/2023

Labelling

1. Without prejudice to the individual measures referred to in Article 5, materials and articles which have not yet come into contact with food shall be marked when they are placed on the market: (a) with the words "For food contact" or with a special Reference to their intended use such as for

Example of that as a coffee maker, wine bottle or soup spoon, or with that shown in Appendix II icon and

b) if necessary with special instructions for safe and proper use and

c) with the name or the company and in any case the Address or registered office of the manufacturer, the processor or a seller established in the Community and responsible for placing on the market and

d) in accordance with Article 17, with an appropriate mark or identification allowing the material or item to be traced; and

e) in the case of active materials and articles, with details of the permitted use(s) and other relevant information such as the name and the

Amount of substances released from the active ingredient to enable food business operators using those materials and articles to comply with other relevant Community legislation or, in the absence of such legislation, with national food legislation, including food labeling legislation.

(2) However, the information pursuant to paragraph 1 letter a) is not mandatory for objects which, due to their nature, are clearly intended to come into contact with food.

(3) The information prescribed in paragraph 1 must be clearly visible, clearly legible and indelible.

(4) The delivery of materials and objects to the end consumer is prohibited if the information required under paragraph 1 letters a), b) and e) is not in a form suitable for the

Buyers easy-to-understand language are appropriate.

5. The Member State in which the material or article is marketed may, in accordance with the provisions of the Treaty, require within its territory that labeling information in one or more of its designations

official languages of the Community.

(6) Paragraphs 4 and 5 do not prevent the information on the label from being drawn up in several languages.

UEB2302636

03/14/2023

(7) When delivering to the end consumer, the

Paragraph 1 prescribed information

a) on the materials and objects or on their packaging or b) on labels that are on the materials or objects or on their packaging or c) on an advertisement that is in the immediate vicinity of the materials or objects located and clearly visible to the buyer; for those referred to in paragraph 1 letter c).

However, this possibility only exists if this information

or a label with this information is neither on the manufacturing nor on the label for technical reasons

Have the marketing level affixed to the materials or items.

(8) At levels of trade other than delivery to the end consumer, the information required in paragraph 1 is a) in the accompanying documents or

b) on the labels or packaging, or

c) on the materials or items themselves.

(9) The indications provided for in paragraph 1, letters

a), b) and e) are reserved for materials and objects that comply with: a) the criteria of Article 3 and, where applicable, Article 4 and

(b) the specific measures referred to in Article 5 or, if no such measures have been adopted, the national regulations applicable to these materials and objects.

§ Article 16 concerns the declaration of conformity

Declaration of

conformity 1. The specific measures referred to in Article 5 shall require that the materials and articles covered by the specific measures concerned be accompanied by a written declaration that they comply with the provisions applicable to them.

Appropriate documentation must be available to demonstrate compliance with the regulations. These documents must be made available to the competent authorities upon request.

2. This Regulation shall not prevent Member States from maintaining or adopting national rules on the declaration of conformity of materials or articles in the absence of specific measures.

§ Article 17 concerns traceability Traceability (1)

The traceability of materials and objects must be guaranteed at all stages in order to facilitate controls, the recall of defective products, consumer information and liability assessment.

(2) Entrepreneurs shall, with due regard to technological feasibility Have systems and procedures in place to identify which

UEB2302636
03/14/2023

Company and to which company the materials or objects covered by this ordinance and the associated implementing provisions and, if applicable, the substances or products used for their manufacture were procured or delivered.

This information shall

be made available to the competent authority upon request.

(3) Materials and articles placed on the Community market

must be identifiable within an appropriate system allowing traceability through the marking or relevant documentation and information.

- Regulation (EU) No. 2023/2006: GMP regulation – applies to manufacturers, processors and retailers of all types of materials and objects intended for contact with food

<http://eur-lex.europa.eu/legal-content/DE/TXT/?qid=1479118089468&uri=CELEX:02006R2023-20080417>

• Demand for quality assurance and control system • Proof of conformity of all raw materials used and manufactured

Products •

Everything must be documented

- Disclaimers are allowed if they do not contradict the law.

• The compliance work for a food contact article must be completed by the manufacturer of the finished product. A delegation of conformity work to the user of the finished product is not permitted. • CERAMICS DIRECTIVE

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31984L0500> •

Ceramics Ordinance Austria https://www.ris.bka.gv.at/Documents/BgblPdf/1993_893_0/1993_893_0.pdf

- Council of Europe guidelines: <https://www.edqm.eu/en/food-contact-materials-and-articles>

Issuer's letterhead

ETT Inc.

#402-2243 Folkestone Way

West Vancouver, BC

UEB2302636
03/14/2023

V7W 1P5

Canada

DECLARATION OF CONFORMITY according to Regulation (EC) No. 1935/2004

1. Identity and address of the entrepreneur who issues the declaration of conformity;	<p>ETT Inc.</p> <p>#402-2243 Folkestone Way</p> <p>West Vancouver, BC</p> <p>V7W 1P5</p> <p>Canada</p>
2. Dealer	<p>Jürgen Freudensprung</p> <p>Africhgasse 99</p> <p>A-1220 Vienna</p> <p>Austria</p>
3. Product	<p>FRYLOW</p> <p>Item number?</p>
4. Date of issue	03/14/2023
5. Confirmation that the item is out several materials the relevant Requirements met in Article 3, Article 11 paragraph 5, Article 15 and Article 17 of	<p>The requirements of the regulations (EG) No. 1935/2004 and (EG) No. 2023/2006 as amended. are respected.</p>

UEB2302636
03/14/2023

Regulation (EC) No. 1935/2004, as well as in the regulations applicable to the respective materials;	<p><u>Article 3</u> of Regulation (EC) No. 1935/2004: is complied with if used as intended according to labelling.</p> <p><u>Article 11(5)</u> of Regulation (EC) No. 1935/2004: not applicable</p> <p><u>Article 15</u> of Regulation (EC) No. 1935/2004:</p> <p>The marking corresponds to the Requirements</p> <p><u>Article 17</u> of Regulation (EC) No. 1935/2004:</p> <p>A system for tracking the item is in place</p> <p><u>Ceramic tiles</u> correspond to:</p> <p>Directive 84/500/EEC on ceramic articles intended to come into contact with food; implemented nationally by the Ceramics Ordinance, Federal Law Gazette No. 893/1993</p> <p><u>Stainless steel holder</u> corresponds to EDQM resolution Resolution CM/Res(2013)9 (see LVA test report UEB2302635)</p>
6. Substances for which restrictions and/or specifications are set so that downstream entrepreneurs can also ensure compliance with the regulation;	<p><u>Ceramics</u>: lead, cadmium, antimony, barium, zinc</p> <p><u>Stainless steel</u>: lead, cadmium, mercury, tin, chromium, aluminium, iron, manganese, zinc, copper, antimony, nickel, silver, molybdenum, cobalt, thallium, vanadium</p>
7. Dual use additives	unavailable
8th.	
i) type or types of food intended to come into contact with it;	<p>All types of food except acidic with a pH < 4.5</p> <p>Intended for contact with oil</p>

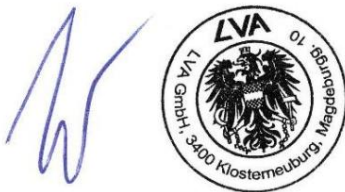
UEB2302636

03/14/2023

ii) duration and temperature of treatment and storage in contact with the food; iii) Ratio of with food in area coming into contact with the volume, based on which the conformity of the material or item has been detected;	Long-term contact in hot frying oil Temperature approx. 160-180°C Contact duration > 30 days
	Test conditions when checking for migration: Ceramic tiles: O/V= 1.27 dm ² / 100 ml Stainless steel holder: Envelope volume: 1125 ccm Simulant quantity: 1000ml
Signature, possibly handwritten, function of the drafter	

The table must be copied by the entrepreneur into a document with a company header; to check the passages highlighted in yellow for their truthfulness and to correct them if necessary.

Appraiser according to §73, LMSVG
Dipl.Ing. Johanna Foisner



Your customer advisor: Helene Sützl BA +43 2243 26622/4207; helene.suetzl@lva.at

03/14/2023

report

client Pacific Alliance International
Marketing Ltd 3358
Ravenwood Rd.
V9C 2X4 Victoria, BC
Canada

Order **Text for conformance work**
UEB2302636

date of receipt	01/23/2023
Last subsequent delivery	01/27/2023
for assessment-relevant information	
beginning of the exam	01/23/2023
end of the exam	03/14/2023

Sample number: B2302636

Sample description

Delivery method:
Text for conformance work

delivery boy

for the test center the authorized signatory

DI Johanna Foisner



Customer advisor: Helene Sützl +43 2243/26622/4207, email: helene.suetzl@lva.at

UEB2302635
03/14/2023

Company Pacific Alliance
International Marketing Ltd
3358 Ravenwood Rd.
CND V9C 2X4 Victoria, BC

EXPERTISE on test report UEB2302635 Frylow

The present sample was subjected to a chemical analysis.

The basis for the assessment are the results determined in the test report mentioned above.

The following bases were used for the assessment:

- Food Safety and Consumer Protection Act (LMSVG; BGBl. I 13/2006) • Regulation (EC) No. 1935/2004 on materials and objects intended to come into contact with food • Regulation (EC) No. 2023/ 2006 on good manufacturing practice for materials and articles intended to come into contact with food • Directive 84/500/EEC on ceramic articles intended to come into contact with food; implemented nationally through the Ceramics Ordinance, Federal Law Gazette No. 893/1993
- Guideline of the Council of Europe "Metals and alloys used in food contact materials and articles" (1st Edition) from September 2013

Enclosed documents:

- Presentation (in German) on how the device works. • Analysis certificate Japan Food Research Laboratories (JFRL) with the number 19044376001-0201 from 04/24/2018
- NSF Product Certification Audit Report from the audit on March 5th, 2020 at Everwall JP Trading Co., Ltd, Japan • NSF "Authorized Registered Formulation" dated 01/08/2011 • SGS Hong Kong Test Report No. HKHL1508034087JL dated 08/25/2015 • Frylow Technical Specification Sheet issued by Everwall Inc.

The present sample, a rectangular stainless steel frame with ceramic tiles, is to be immersed in the frying fat of the fryer when used as intended in order to improve the quality of the frying oil. The food law assessment of this product is carried out

Frylow

UEB2302635
03/14/2023

exclusively with regard to the suitability of the materials used. The advertised mode of action is not the subject of this report.

The ceramic tiles are tested and evaluated according to the Ceramics Ordinance. The stainless steel bracket is tested and evaluated according to the "Metals and alloys" guideline of the European Council.

Ceramic tiles

Although only one test approach can be used for evaluation if all measured values are below the limit values, in accordance with the "repeated-use approach" for other materials, 3 consecutive tests were carried out on the same test piece in order to follow the trend of the measurement results.

The readings show a decreasing trend. This means that the surface of the tiles is not attacked, allowing more items to be dropped with each use.

Accordingly, the following limit values apply to objects that cannot be filled or with a filling depth of at least 25 mm:

Lead: 0.8 mg/dm² (= 800 µg/dm²)

Cadmium: 0.07 mg/dm² (= 70 µg/dm²)

Zinc: 3mg/item (= 3000µg/item)

Antimony: 1mg/ item (=1000µg/ item)

Barium: 1mg/ item (=1000µg/ item)

results

element	Laboratory result 1st approach mg/l	Laboratory result 2nd approach mg/l	Converted result from 3.	limit
Lead	<0.001	<0.001	Preparation ⁻⁴	0.8 (mg/ dm ²)
cadmium	<0.0003	<0.0003	mg/ dm ²	0.07 (mg/ dm ²)
zinc	<0.050	<0.050	<0.787.10 <0.236.10 ⁻⁴	3.0 (mg/item) 1.0 (mg/item)
antimony	0.0851	0.0156	<0.0004 (mg/ 100 ml)	1.0 (mg/item)
barium	<0.100	<0.100	0.0016 (mg/ 100) <0.0100	*
titanium	0.090	0.0416	(mg/100 ml) 0.0042 (mg/100 ml)	

*There is no limit for titanium in the Ceramics Directive/Regulation. Measurement takes place due to risk discussion about titanium.

All readings are below these limits.

Frylow

UEB2302635
03/14/2023

stainless steel holder

There is no common legal regulation for metal food contact objects. The tests and the evaluation of the test results are therefore carried out according to the state of the art in science and technology in accordance with the Council of Europe guidelines for "Metals and alloys used in food contact materials and articles".

test conditions

Food simulant: **artificial water** (simulant for all foods except acidic with a pH < 4.5)

Test temperature: **100°C**

Test time: **2 hours**

Repeated use

Envelope Volume (EV): 1125cc

Specific Release (SR)

Limit values = SRL (specific release limit)

Reference Weight (RW)

Mass of delivered element (M)

Concentration of released element in measurement solution (C)

Volume of simulant used (V)

$RW = EV/1000$

$M = C \times V$

$SR = M / RW$

evaluation table

element	measurement result approach 1 mg/l	measurement result approach 2 mg/l	measurement result Approach 3 mg/l	Calculated the SR Approach 1 mg/kg	Calculate the he SR approach 2 3 mg/kg mg/kg	Calculated SR approach 3 mg/kg	SRL mg/kg
Lead (Pb)	<0.001	<0.001	<0.001	<0.0009	<0.0003	<0.0003	0.010
cadmium (CD)	<0.0003	<0.0003	<0.0003	<0.0003			0.005
Chromium (Cr)	<0.005	<0.005	<0.005	<0.004	<0.004	<0.004	0.250

UEB2302635

03/14/2023

Iron (Fe) <0.020	<0.020	<0.020	<0.018	<0.018 <0.018 <0.004	40
Manganese <0.005 (mn)	<0.005	<0.005	<0.004	<0.004	1.8
Zinc (Zn) <0.050	<0.050	<0.050	<0.044	<0.044 <0.044 <0.002	
Nickel (Ni) 0.0034	<0.002	<0.002	0.003	<0.002 <0.013 <0.013	5
Molybdenum <0.015 (Mon)	<0.015	<0.015	<0.013		0.14 0.12
Cobalt (Co) <0.002	<0.002	<0.002	<0.002	<0.002 <0.002	0.02
Vanadium <0.001 (V)	<0.001	<0.001	<0.0009	<0.0009 <0.0009	0.01
mercury (Hg)		<0.0001		<0.00009 0.003	
Tin (Sn)		<0.005		<0.004	100
antimony (Sb)		<0.0005		<0.0004	0.04
aluminum (al)		<0.020		<0.018	5
copper (Cu)		<0.100		<0.089 4 <0.0009	
Silver (Ag)		<0.001		0.08 <0.00009 0.0001	
thallium (TI)		<0.0001			

The result of the 3rd approach must be smaller than the SRL. This takes into account the formation of a passivation layer AND the following result must also correspond: The following calculation checks compliance with the toxicologically defined "exposure equivalent" for daily exposure over a period of one week.

Result from approach 1 + result from approach 2 < 7x SRL.

This calculation is not carried out here because, with the exception of molybdenum, all the results in the first test run were below the reporting limit.

(Mo: 1st batch + 2nd batch z= **0.0054 mg/kg** < 7 x SRL = **0.98 mg/kg**)

The stainless steel quality corresponds to all measured elements.

According to the results of the tests carried out, the present sample **does not give cause for complaint** according to the above assessment criteria and is suitable for the intended use.

Appraiser according to §73, LMSVG

Dipl.Ing. Johanna Foisner



Your customer advisor: Helene Sützl BA +43 2243 26622/4207; helene.suetzl@lva.at



03/14/2023

report

client Pacific Alliance International
Marketing Ltd 3358 Ravenwood
Rd.
V9C 2X4 Victoria, BC
Canada

Order **Frylov**
UEB2302635

date of receipt	01/23/2023
Last subsequent delivery	01/27/2023
for assessment-relevant information	
beginning of the exam	01/23/2023
end of the exam	03/14/2023

Sample number: B2302635**Sample description**

Delivery method:
1 pattern

delivery boy

Frylov; -further imprint see attachment;

Sub-sample 01 ceramic tiles - migration production

Chemical investigation**Surface and volume determination**

VE00005584

surface	1.27 dm ²
volume	100ml _

Migration according to ceramics regulation 84/500/EEC

VE00005849

Sub-sample 02 ceramic tiles - 1st test approach

Chemical investigation**Page 1 of 8 for UEB23026350002**

LVA GmbH, Magdeburggasse 10, 3400 Klosterneuburg | T. +43 2243 26622-0 | service@lva.at | www.lva.at
Erste Bank: IBAN AT17 2011 1294 6947 4410 | BIC GIBAATWWXXX | Raiffeisenbank: IBAN AT31 3236 7000 0030 9351 | BIC RLNWATWW367
DVR: 0722651 | UID Nr. ATU 57127399 | FNr. 236286f | Landesgericht Korneuburg

Accredited test center PSID No.140 according to EN ISO/IEC 17025

The test results refer exclusively to the examined sample. Duplication in extracts is not permitted without our written consent.



Lead (Pb) ISO17294-2; ICP-MS; VE00005722		
pb	<1 µg/L	
Cadmium (Cd) ISO17294-2; ICP-MS; VE00005723		
CD	<0.3 µg/l	
Zinc (Zn) ISO17294-2; ICP-MS; VE00005737		
Zn	<50 µg/l	
Antimony (Sb) ISO17294-2; ICP-MS; VE00005732		
Sb	85.1 µg/L	
Barium (Ba) ISO17294-2; ICP-MS; VE00005740		
ba	<100 µg/l	
Titanium (Ti) ISO17294-2; ICP-MS; VE00006008		
Ti	90.0 µg/l	1

Sub-sample 03 ceramic tiles - 3rd test approach

Chemical investigation

Lead (Pb) ISO17294-2; ICP-MS; VE00005722		
pb	<1 µg/L	
Cadmium (Cd) ISO17294-2; ICP-MS; VE00005723		
CD	<0.3 µg/l	
Zinc (Zn) ISO17294-2; ICP-MS; VE00005737		
Zn	<50 µg/l	
Antimony (Sb) ISO17294-2; ICP-MS; VE00005732		
Sb	15.6 µg/L	
Barium (Ba) ISO17294-2; ICP-MS; VE00005740		
ba	<100 µg/l	



Titanium (Ti)		
ISO17294-2; ICP-MS; VE00006008		
Ti	41.6 µg/L	1

Subsample 04 stainless steel holder - preparation of the measuring solution

Chemical investigation

Surface and volume determination		
VE00005584		
volume	1000ml _	
envelope volume	1125cc _	1
migrate production		
VE00007021		
simulance	artificial water	
storage duration	2 hours	
temperature	100°C _	
approaches	1	
Repeated use		

Sub-sample 05 stainless steel holder - elements from approach 1

Chemical investigation

Lead (Pb)		
ISO17294-2; ICP-MS; VE00005722		
Pb	<1 µg/L	
Cadmium (Cd)		
ISO17294-2; ICP-MS; VE00005723		
CD	<0.3 µg/l	
Chromium (Cr)		
ISO17294-2; ICP-MS; VE00005735		
Cr	<5 µg/L	
iron (Fe)		
ISO17294-2; ICP-MS; VE00005720		
iron	<20 µg/l	



Manganese (Mn)		
ISO17294-2; ICP-MS; VE00005727		
manganese	<5 µg/L	
Zinc (Zn)		
ISO17294-2; ICP-MS; VE00005737		
Zn	<50 µg/l	
Nickel (Ni)		
ISO17294-2; ICP-MS; VE00005736		
no	3.4 µg/l	
Molybdenum (Mo)		
ISO17294-2; ICP-MS; VE00006009		
Mon	<15 µg/l	1
cobalt (Co)		
ISO17294-2; ICP-MS; VE00006010		
co	<2 µg/L	1
vanadium (V)		
ISO17294-2; ICP-MS; VE00006013		
V	<1 µg/L	1

Sub-sample 06 stainless steel holder - elements from approach 2

Chemical investigation

Lead (Pb)		
ISO17294-2; ICP-MS; VE00005722		
pb	<1 µg/L	
Cadmium (Cd)		
ISO17294-2; ICP-MS; VE00005723		
CD	<0.3 µg/l	
Chromium (Cr)		
ISO17294-2; ICP-MS; VE00005735		
Cr	<5 µg/L	
iron (Fe)		
ISO17294-2; ICP-MS; VE00005720		
iron	<20 µg/l	
Manganese (Mn)		
ISO17294-2; ICP-MS; VE00005727		
manganese	<5 µg/L	





Zinc (Zn)		
ISO17294-2; ICP-MS; VE00005737		
Zn	<50 µg/l	
Nickel (Ni)		
ISO17294-2; ICP-MS; VE00005736		
no	<2 µg/L	
Molybdenum (Mo)		
ISO17294-2; ICP-MS; VE00006009		
Mon	<15 µg/l	1
cobalt (Co)		
ISO17294-2; ICP-MS; VE00006010		
co	<2 µg/L	1
vanadium (V)		
ISO17294-2; ICP-MS; VE00006013		
V	<1 µg/L	1

Sub-sample 07 stainless steel holder - elements from approach 3

Chemical investigation

Lead (Pb)		
ISO17294-2; ICP-MS; VE00005722		
pb	<1 µg/L	
Cadmium (Cd)		
ISO17294-2; ICP-MS; VE00005723		
CD	<0.3 µg/l	
Mercury (Hg)		
ISO17294-2; ICP-MS; VE00005724		
Hg	<0.1 µg/l	
Tin (Sn)		
ISO17294-2; ICP-MS; VE00005726		
sn	<5 µg/L	
Chromium (Cr)		
ISO17294-2; ICP-MS; VE00005735		
Cr	<5 µg/L	
Aluminum (Al)		
ISO17294-2; ICP-MS; VE00005711		
Al	<20 µg/l	



iron (Fe)		
ISO17294-2; ICP-MS; VE00005720		
iron	<20 µg/l	
Manganese (Mn)		
ISO17294-2; ICP-MS; VE00005727		
manganese	<5 µg/L	
Zinc (Zn)		
ISO17294-2; ICP-MS; VE00005737		
Zn	<50 µg/l	
copper (Cu)		
ISO17294-2; ICP-MS; VE00005739		
Cu	<100 µg/l	
Antimony (Sb)		
ISO17294-2; ICP-MS; VE00005732		
Sb	<0.5 µg/l	
Nickel (Ni)		
ISO17294-2; ICP-MS; VE00005736		
no	<2 µg/L	
Silver (Ag)		
ISO17294-2; ICP-MS; VE00005741		
Ag	<1 µg/L	1
Molybdenum (Mo)		
ISO17294-2; ICP-MS; VE00006009		
Mon	<15 µg/l	1
cobalt (Co)		
ISO17294-2; ICP-MS; VE00006010		
co	<2 µg/L	1
Thallium (Tl)		
ISO17294-2; ICP-MS; VE00006011		
tsp	<0.1 µg/l	1
vanadium (V)		
ISO17294-2; ICP-MS; VE00006013		
V	<1 µg/L	1





for the test center the authorized signatory

DI Johanna Foisner

Customer advisor: Helene Sützl +43 2243/26622/4207, email: helene.suetzl@lva.at

Comments: 1
not accredited



