

HP53-25-155

CAS# 25213-02-9

Regulatory Position Statement

Regulatory Issues

January 2020

IMDS

For an IMDS listing for automotive use, please send an email to carolyn.ramsden@ineos.com.

Regulations/Directives Applicable to End Use Articles

This product conforms to the substance limits and prohibition requirements of the following:

- **EU Cosmetic Regulation (EC) No 1223/2009**
- **Consumer Product Safety Improvement Act (CPSIA) of 2008/Lead and Phthalates in Toys**
- **EU Safety of Toys EN 71-3: 2019**
- **RoHS 2, Directive 2011/65/EU, as amended by 2015/863/EU**
- **WEEE EU 2012/19/EU**

CONEG - "Toxics in Packaging"/EU Directive 94/62/EC/Heavy Metals

No antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury or selenium is intentionally added as a raw material or additive in the formulation of this product. However, this resin may contain trace levels of metals from catalyst residues. Previous testing for these metals resulted in a total incidental amount for all metals detected of < 5 ppm, compared to the CONEG requirement of < 100 ppm. The result for incidental lead concentrations was less than the detection limit of 10 ppb (0.01 ppm).

Other Regulations/Directives

California Proposition 65, as amended

No substance listed on California's Proposition 65 chemicals listing, known to the State of California to cause cancer or reproductive toxicity, is intentionally added in the manufacture of this product.

Canada (WHMIS, Toxic Substances and Chemical Management Plan, as amended)

None of the chemicals on WHMIS, Canada's *Prohibition of Certain Toxic Substances* list or the Canadian Chemical Management Plan are intentionally added as raw materials to this product.

EU Commission Regulation (EC) No 1895/2005, as amended

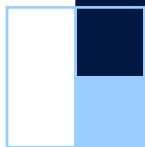
This Regulation does not apply to our product because it is not manufactured with any of the following substances:

- (a) 2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether, hereinafter referred to as 'BADGE' (CAS No 001675-54-3), and some of its derivatives;
- (b) bis(hydroxyphenyl)methane bis(2,3-epoxypropyl)ethers, hereinafter referred to as 'BFDGE' (CAS No 039817-09-9);
- (c) other novolac glycidyl ethers, hereinafter referred to as 'NOGE'.

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GMP and EU Commission Regulation (EC) No 2023/2006

INEOS O&P USA maintains an ISO 9001 system that corresponds to the requirements of EC No 2023/2006 and addresses good manufacturing practice for materials and articles intended to come into contact with food. US FDA regulations do not specifically address good manufacturing practices (GMP) for food contact materials. A copy of the current ISO certificate is available online at [ISO Certificate](#) under Technical Information.

REACH

Please refer to our REACH statement online at [REACH SVHCs](#) covering REACH registration issues, CoRAP and SVHCs.

GLOBAL INVENTORY STATUS

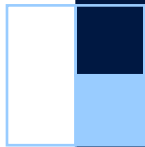
<i>Country</i>	<i>Inventory</i>	<i>Y/N</i>
United States	TSCA This product has been verified with a status of “active” on the TSCA inventory prior to Feb 7, 2018.	Y
European Union	EINECS	Y
China	IECSC	Y
Canada	DSL	Y
Australia	AICS	Y

<i>Country</i>	<i>Inventory</i>	<i>Y/N</i>
Japan	ENCS (METI) ISHL	Y
New Zealand	NZIoC	Y
Korea	KECI	Y
Philippines	PICCS	Y
Taiwan	TCSI	Y

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Substances of Concern to Our Customers

Based on knowledge of our raw materials and information from our suppliers, we can state that none of the substances of concern to our customers listed below are intentionally added to this product. We do not conduct routine analytical testing for the presence of these substances in our products.

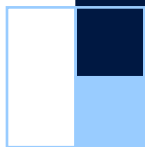
Genetically Modified Organisms (GMO) Because of the multitude of crop sources used, our suppliers of plant-based additives are unable to certify that their products are 100% GMO-free.

- 3-MCPD (3-monochloropropane)
- Alkylphenols and Ethoxylates
- Allergens or allergen derivatives¹
- Animal Derived Material/TSE/BSE²
- Antimicrobial agents/Biocides/Fungicides/Pesticides (*Substances identified as such and used for such purpose*)
- Asbestos
- Azo dyes/ Colorants/Pigments
- Azodicarbonamide
- Benzophenones
- Benzoate Preservatives (BHA, TBHQ)
- Bisphenols (e.g., A, F, S)
- Carboxymethylcellulose
- CITES Appendix (I, II, III)
- Conflict Minerals (columbite-tantalite (coltan, niobium, tantalum), cassiterite (tin), gold, and wolframite (tungsten)³
- Cocamide diethanolamide
- Decabromodiphenyl ether (Deca)
- Diethanolamine salts of mono- and bis-
- Dimethyl Fumarate (DMF)
- Dioxins
- Flame Retardants (e.g. Brominated, Halogenated, Phosphorous- or Nitrogen-based, Chlorinated, etc.)
- Formaldehyde
- Fragrances
- GADSL, “Global Automotive Declarable Substance List,” as amended
- Halogens (fluorine, chlorine, bromine, iodine, astatine)
- HAPs (Hazardous Air Pollutants) Section 112(b) of the US Clean Air Act
- Heavy Metals (As, Ba, Cd, Cr, Hg, Pb, Sb, Se)
- International Council for Harmonisation (ICH) Q3D *Elemental Impurities*
- “Intelligent packaging” materials
- IUCN Red List of Threatened Species
- Jatropha Oil
- Latex
- Materials banned by Lacey Act of 1900
- Melamine and cyanuric acid

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- Methylisothiazolinone (MI / MIT) & Methylchloroisothiazolinone (MCI / CMIT)
- Microbeads
- Nanoparticles
- N-Ethyl-toluenesulfonamide (Ortho/Para)
- Nitrates
- Nitrocellulose
- Nitrosamines
- Nonylphenol ethoxylates (NPEs)
- Organotin Compounds, including tributyl tin, tributyl tin oxide, triphenyl tin, trialkyl tin
- Ozone Depleting Chemicals (ODCs)
- PAHs (Polycyclic Aromatic Hydrocarbons)
- Parabens
- Pentanoic acid
- Perchlorates
- Perfluoroalkyl substituted phosphate ester acids
- Perfluorinated and polyfluorinated compounds, including their acid, salts and pre-cursors such as PFCs, PFAs and PFASs, PFNs, PFOs and PFOA and PFCAs
- Persistent Organic pollutants (POPs) EU No 757/2010 Annex I amending EC No 850/2004
- Phthalates (e.g., BBP, BDP, DBP, DCP, DEHP, DEP, DiBP, DiDP, DiNP, DMP, DnHP, DnOP, DiiHP)
- Photoinitiators (e.g., ITX)
- Polysorbate 80
- Polybrominated compounds (PBBs, PBDEs, and PBTs)
- Polyhalogenated Organo Compounds (PCBs, PCTs, PCNs, and Ugilec)
- PVC
- Radioactive Substances
- REACH Annexes XIV and XVII
- Recycled or reused material
- Red List (Living Future Bldg. Materials List)
- Short Chain Chlorinated paraffins (SCCPs)
- Silica
- Silicone
- Styrene
- Solvents, residual solvents
- State Lists – including Maine, Massachusetts, Minnesota, Vermont, Washington
- SVHCs (*Please refer to our REACH statement online at www.ineos-op.com covering REACH registration issues, CoRAP and SVHCs.*)
- Triclosan (2,4,4' –trichloro-2'-hydroxy-diphenyl ether)
- Tris (Nonylphenyl) phosphite (TNPP)

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- ¹ from such things as pigments, artificial sweeteners (e.g. aspartame), almonds, Brazil nuts, cashews, corn, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios and walnuts; peanuts, lupine, soy/soybeans, peas, carmine/cochineal, milk, lecithin, eggs, fish, shellfish/crustacea or mollusks, tree nuts, celery, sesame seeds, mustard or mustard seeds, diacetyl, glutamites, glutamic acid, MSG or hydrolyzed vegetable proteins, nitrites or sulfites, or gluten from the grains of the following cereals: barley; oats; rye; triticale; or wheat
- ² No animal fats, oils, milk products or other animal- or tallow-derived products are used as components of, or in the manufacture of, this product.
- ³ INEOS O&P USA (INEOS O&P) is not a publicly traded company so is not subject to the SEC reporting requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

For further information, please see our website www.ineos-op.com or contact me in Product Stewardship:

As agent for INEOS O&P USA,



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