

July 2021

Food Contact Clearances

US FDA Compliance (Title 21 CFR)

Under 21 CFR 177.1520(c) 1.1a, this resin may be safely used in articles or components of articles intended for use in contact with food. All adjuvants used in the manufacture of this resin are cleared for use in 21 CFR 170-189 by specific citation, generally recognized as safe (GRAS), prior sanctioned or under a specific Food Contact Notification (FCN). The finished polymers may be safely used in contact with food types I, II, IV-B, VIA, VIB, VII-B and VIII described in Table 1 of 21 CFR 176.170(c), under conditions of use A through H described in Table 2 of 176.170(c) and with food types III, IV-A, V, VI-C, VII-A, and IX under conditions of use B through H.

EU Food Contact Compliance – Commission Regulation (EU) No 10/2011

As dispatched from our plant, the monomers and additives of this INEOS product meet the relevant requirements of Commission Regulation (EU) No 10/2011 as amended under the Framework Regulation EU 1935/2004 on materials and articles intended to come into contact with food. Please send an email to Product Stewardship* if you need an EU Declaration of Compliance.

Health Canada, Health Products and Food Branch “No Objection” Letter

A Letter of No Objection (LONO) under File Number KS19011101 is available for this product. Further restrictions may apply. Please contact Product Stewardship for details.

China’s Hygienic Standards for Uses of Additives in Food Containers and Packaging Materials (GB 4806-2016 and GB 9685-2016)

As dispatched from our plant, this product meets relevant requirements laid down in GB 4806.1-2016, GB 4806.6-2016, and GB 9685-2016. As the conversion process can affect migration, only the converter can guarantee to the food packager that any limit is not exceeded.

Japan Food Contact Compliance - Positive List of substances

As dispatched from our plant, the monomers and additives of this INEOS product meet the relevant requirements of the Positive List (PL) System for food-contact plastics laid down in Table 1(1) – Base Polymers (Plastics) and Table 2 – Additives, Coating Agents, Etc., respectively, under the Ministry of Health, Labour and Welfare (MHLW) Food Sanitation Act. Please contact Product Stewardship for additional information.

MERCOSUR - Argentina, Brazil, Paraguay, Uruguay, and Venezuela

As dispatched from our plant, this product meets the requirements of MERCOSUR GMC Res. N° 02/2012 and Res. N° 39/2019, which provides a Positive List of monomers and additives, respectively, that are authorized for use in articles that come into contact with food. In order to guarantee the compliance with the Resolution, the final product must be analysed by the manufacturer concerning total migration limits.

Contact us:**Customer Service: 1-800-527-5419****carolyn.ramsden@ineos.com****www.ineos-op.com**

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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, Annexes II and III
- 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

The regulated metals – lead, mercury, cadmium, and hexavalent chromium – are not intentionally added during the manufacturing process. Testing for heavy metals – cadmium, chromium, lead and mercury – resulted in a total for all metals detected of < 2 ppm, compared to the CONEG requirement of < 100 ppm. The result for incidental lead concentration was less than the detection limit of 0.1 ppm.

U.S. Pharmacopeial Convention (USP)

This resin has not been tested under the criteria specified in the United States Pharmacopoeia, nor that specified by ISO 10993 for biological testing of materials. This resin is not intentionally formulated with aluminum, arsenic, cadmium, lead, mercury, cobalt, nickel, chromium, titanium, vanadium, zinc, and/or zirconium. We do not test for ingredients not intentionally added. Please contact us for additive information if needed for USP 661.2 testing.

European Pharmacopoeia

This product contains an additive that is not specified in European Pharmacopoeia 3.1.3, "Polyolefins".

Other Regulations/Directives

California Proposition 65 - Safe Drinking Water and Toxic Enforcement Act of 1986, 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 our products are 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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RECYCLING

The recycling code shown to the right applies to the resin only. It may not apply to products manufactured from this resin. Recycling codes for finished articles must be determined by the manufacturer on a case-by-case basis.



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

INEOS O&P USA maintains an ISO 9001 system that corresponds to the requirements of FSMA and EC No 2023/2006 and addresses good manufacturing practice for materials 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 certificate is available online under Technical Information or by following the link provided here: [ISO Certificate](#).

Global Inventory Status

Country	Inventory	Status
Australia	Australia Inventory of Industrial Chemicals: AIIC	Y
Canada	Domestic Substances List: DSL	Y
China	Chinese List on New Chemical Substances: IECSC	Y
European Union	EINECS	Y
Japan	Japan Inventory of Existing & New Chemical Substances: METI/ENCS	Y
Korea	Korea Existing Chemicals Inventory: KECI	Y
New Zealand	New Zealand Inventory of Chemicals: NZIoC	Y
Philippines	Philippines Inventory of Chemicals and Chemical Substances: PICCS	Y
Taiwan	Taiwan Chemical Substance Inventory: TCSI	Y
United States	EPA Toxic Substance Control Act: TSCA – Active Substance List	Y

EU REACH

Please refer to our REACH Statement online covering applicable registration, CoRAP, and SVHC under Technical Information or by following the link provided here: [REACH SVHC](#).

FDA Drug Master File

This product is filed with the FDA in INEOS Drug Master File 12-042. A letter of authorization for the FDA to access our file on your behalf is available upon request.

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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.

Substance List	
3-MCPD (3-monochloropropane)	Diethanolamine salts of mono- and bis
Alkyphenols and Ethoxylates	Dimethyl Fumarate (DMF)
Allergens or allergen derivatives ¹	Dioxins
Animal Derived Material/TSE/BSE ²	Flame Retardants (e.g. Brominated, Halogenated, Phosphorous- or Nitrogen-based, Chlorinated, etc.)
Antimicrobial agents/Biocides/Fungicides/ Pesticides (Substances identified as such and used for such purpose)	Formaldehyde
Asbestos	Fragrances
Azo dyes/ Colorants/Pigments	GADSL, "Global Automotive Declarable Substance List," as amended
Azodicarbonamide	Halogens (fluorine, chlorine, bromine, iodine, astatine)
Benzophenones	HAPs (Hazardous Air Pollutants) Section 112(b) of the US Clean Air Act
Benzoate Preservatives (BHA, TBHQ)	Heavy Metals (As, Ba, Cd, Cr, Hg, Pb, Sb, Se)
Bisphenols (e.g., A, B, F, S)	International Council for Harmonisation (ICH) Q3D <i>Elemental Impurities</i>
Carboxymethylcellulose	"Intelligent packaging" materials
CITES Appendix (I, II, III)	IUCN Red List of Threatened Species
Conflict Minerals (columbite-tantalite (coltan, niobium, tantalum), cassiterite (tin), gold, and wolframite (tungsten) ³	Jatropha Oil
Cocamide diethanolamide	Latex
Decabromodiphenyl ether (Deca)	Materials banned by Lacey Act of 1900

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Substance List

Melamine and cyanuric acid	Photoinitiators (e.g., ITX)
Methylisothiazolinone (MI / MIT) & Methylchloroisothiazolinone (MCI / CMIT)	Polysorbate 80
Microbeads	Polybrominated compounds (PBBs, PBDEs, and PBTs)
Nanoparticles	Polyhalogenated Organo Compounds (PCBs, PCTs, PCNs, and Ugilec)
N-Ethyl-toluenesulfonamide (Ortho/Para)	PVC
Nitrates	Radioactive Substances
Nitrocellulose	REACH Annexes XIV and XVII
Nitrosamines	Recycled or reused material
Nonylphenol ethoxylates (NPEs)	Red List (Living Future Bldg. Materials List)
Organotin Compounds, such as tributyl tin, trimethyl tin oxide, triphenyl tin, and trialkyl tin	Short Chain Chlorinated paraffins (SCCPs)
Ozone Depleting Chemicals (ODCs)	Silica
PAHs (Polycyclic Aromatic Hydrocarbons)	Silicone
Parabens	Styrene
Pentanoic acid	Solvents, residual solvents
Perchlorates	State Lists – including Maine, Massachusetts, Minnesota, Vermont, Washington
Perfluoroalkyl substituted phosphate ester acids	SVHCs (<i>Please refer to our REACH statement online at www.ineos-op.com covering REACH registration issues, CoRAP and SVHCs.</i>)
Perfluorinated and polyfluorinated compounds, including their acid, salts and pre- cursors such as PFCs, PFAs and PFASs, PFNs, PFOs and PFOA and PFCAs	Triclosan (2,4,4' –trichloro-2'-hydroxy-diphenyl ether)
Phthalates (e.g., BBP, BDP, DBP, DCP, DEHP, DEP, DiBP, DiDP, DiNP, DMP, DnHP, DnOP, DiiHP) ⁴	Tris (Nonylphenyl) phosphite (TNPP)

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1. from such things as pigments, fragrances, 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. One or more of the additives used in this product may be produced from animal-derived material. We have received from our suppliers a statement that their additives are BSE/TSE-free. The reason(s) given are:
 1. The source material is from the US, or
 2. The source material complies with the Animal by Products Directive 1774/2002 and its amendments, or
 3. The raw materials:
 - a. originate from GBR-C1 and C2 countries (e.g. countries with very small risk of BSE), or
 - b. originate from GBR-C3 and C4 countries (e.g. countries with very small BSE risk) and the base products have food or feed quality and the specific risk material was removed and
 4. The material has been processed at a minimum of 200° C at the appropriate pressure for at least 20 minutes following EU (99/534/EC) guidelines.
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.
4. As with most polypropylene grades, including grades from other producers, this resin may contain trace levels of phthalates. If needed, please contact Product Stewardship for further information.

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

As agent for INEOS O&P USA,



*Email: carolyn.ramsden@ineos.com

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