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## Regulatory Issues

### International Standards

For information relating to compliance with NSF International or CSA International standards, please visit the corresponding website(s) at [www.nsf.org](http://www.nsf.org) or [www.csagroup.org](http://www.csagroup.org), or contact INEOS Technical Services at 1-800-338-0489.

### US FDA Food Contact Clearance

This product is not suitable for use in food contact products.

## 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.

## 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.

#### Contact us:

Customer Service: 1-800-527-5419

[carolyn.ramsden@ineos.com](mailto:carolyn.ramsden@ineos.com)

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## Other Regulations/Directives

### 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'.

### 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 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](#).

**Contact us:**  
**Customer Service: 1-800-527-5419**  
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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 <sup>1</sup>  | Dioxins  |
| Animal Derived Material/TSE/BSE <sup>2</sup>  | Flame Retardants (e.g. Brominated, Halogenated, Phosphorous- or Nitrogen-based, Chlorinated, etc.) |
| Antimicrobial agents/Biocides/Fungicides/ Pesticides<br>(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) <sup>3</sup> | 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 <a href="http://www.ineos-op.com">www.ineos-op.com</a> 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, DiHP) <sup>4</sup>   | 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. No animal fats, oils, milk products or other animal- or tallow-derived products are intentionally 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.
4. No phthalates (e.g., DEHP, DIDP, DINP, DMP, DIDP, BBP, DNOP, DBP, DEP) are intentionally added nor used as additives or raw materials in the manufacture of this product.

For further information, please see our website [www.ineos-op.com](http://www.ineos-op.com) or contact me in Product Stewardship:

As agent for INEOS O&P USA,



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