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Regulatory Issues

International Material Data System (IMDS)

For an IMDS listing for automotive use, please send an email to your INEOS Sales or Technical Service Representative.

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 3, 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.

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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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](#).

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.



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](#).

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

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Substance List

Materials banned by Lacey Act of 1900	Persistent Organic Pollutants (POPs) as listed in Regulation (EU) 2019/1021 Annex I-IV, including all amendments up to (EU) 2021/277, amending EC No 850/2004 & Annexes A, B, & C of Stockholm Convention
Melamine and cyanuric acid	Phthalates (e.g., BBP, BDP, DBP, DCP, DEHP, DEP, DiBP, DiDP, DiNP, DMP, DnHP, DnOP, DiHP)
Methylisothiazolinone (MI / MIT) & Methylchlorisothiazolinone (MCI / CMIT)	Photoinitiators (e.g., ITX)
Microbeads	Polysorbate 80
Mineral Oil Aromatic Hydrocarbons (MOAH) or Mineral Oil Saturated Hydrocarbons (MOSH)	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	Silica
Ozone Depleting Chemicals (ODCs)	Silicone
PAHs (Polycyclic Aromatic Hydrocarbons)	Styrene
Parabens	Solvents, residual solvents
Pentanoic acid	State Lists – including Maine, Massachusetts, Minnesota, Oregon, Vermont, Washington
Perchlorates	SVHC (Please refer to our REACH statement online at www.ineos-op.com covering REACH registration, CoRAP, and SVHC.)
Perfluoroalkyl substituted phosphate ester acids	Triclosan (2,4,4' –trichloro-2'-hydroxy-diphenyl ether)
Perfluorinated and polyfluorinated compounds, including their acid, salts and pre-cursors such as PFCs, PFAs and PFASs, PFNs, PFOs and PFOA and PFCAs	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 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 visit our website www.ineos-op.com.

As agent for INEOS O&P USA,



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