



Date: 11 November 2024

**TO WHOMSOEVER IT MAY CONCERN**

**REGULATORY AFFAIRS AND PRODUCT STEWARDSHIP INFORMATION**

**Polyvinyl Chloride REON 6711**

**Good Manufacturing Practices**

The product complies with the requirements of Regulation 2023/2006/EC (GMP) applicable to intermediate materials.

**European Commission Regulation (EU) No 10/2011 (Food Contact)**

The grade conforms to EU Directive 1935/2004 on materials and articles intended to come into contact with food. The product complies with the requirements of Regulation EU/10/2011 and its subsequent amendments applicable to intermediate materials (Amendments applicable are 2023/1627, 2023/1442, 2020/1245, 2019/1338, 2019/37, 2018/831, 2018/79, 2017/752, 2016/1416, 2015/174, 202/2014, 1183/2012, 1282/2011).

The monomers and additives used to produce this product are listed in the Union List of Authorized Substances of Regulation EU/10/2011. The grade complies with the requirement of Overall Migration Limit (OML) of 60 mg/kg as mentioned in EU/10/2011.

**IS Food Contact**

The grade complies to IS-10151 "Specification for polyvinyl chloride (PVC) and its copolymers for its safe use in contact with foodstuffs, pharmaceuticals and drinking water".

The grade also complies with Indian Standard IS IS-10148 on "Positive list of constituents of polyvinyl chloride (PVC) and its copolymers in contact with foodstuffs, pharmaceuticals and drinking water".

The grade conforms to Overall Migration limit of 60 mg/kg as measured by IS 9845: Determination of Overall Migration of Plastic materials and articles intended to come in contact with Food Stuffs - Method of Analysis.

**China Food Contact Compliance**

The grade meets the requirements of Chinese "positive list" Food Standard GB 9685-2016 Hygienic standards for use of additives in food containers and packaging materials.

The grade meets the requirements of GB 4806.1-2016 National Food Safety Standard-General Safety Requirements for Food Contact Materials and Articles which are applicable to the product.

The base resin in this product complies with the specifications established in GB 4806.7-2023 National food safety standard - Plastic materials and products for food contact.

**German Food Contact Compliance**

The grade conforms to BfR Recommendations on Food Contact Materials, Regulation II Polyvinyl Chloride.

### **Swiss Food Contact Compliance**

The grade complies to Swiss Ordinance SR 817.023. 21 and subsequent amendments.

### **French Food Contact Compliance**

The grade complies with French Decree No 2008-1469 (2008) which states that “at marketing stages other than sale or free distribution to the final consumer, materials and articles intended to come into contact with foodstuffs (that are not already covered by specific European Union measures)”.

### **Latin America MERCOSUR Food Contact Status**

The grade complies to MERCOSUR GMC resolution No. 56/92, GMC resolution no. 39/19 (supersedes the previous regulation on FCMs, GMC 32/2007), GMC Res. No. 03/1992, GMC Res. No. 02/2012.

### **SVHC Declaration**

ECHA has so far identified 242 chemical substances as the Substances of Very High Concern (SVHC), which are in the Candidate List of REACH Regulation (EC/1907/2006) (Updated 07<sup>th</sup> November 2024). We confirm that these substances are not present in more than 0.1% weight / weight in this grade. The list is subjected to be updated with time after inclusion of substances in the candidate list.

### **Japan Food Safety Law**

We confirm that as per the manufacturing process of the above grade, base polymer (monomers) and additives used are below the maximum level usage and are present in the positive list as per Appendix 1, Table 1(1): Base Polymer (Plastics) List and Appendix 1, Table 2: List of additives under Food Sanitation Act (Article 18, Section 1) under Japan Ministry of Health, Labour and Welfare (MHLW; 2020, Notification Number 370) and as per the updated list dated November 2023 (2023; Notification number 324).

### **Canadian Food Packaging Regulations**

The grade complies with the Canadian Division 23 Section B23.001 of the Food and Drugs Act and Regulations.

### **EU Directive - Packaging and Packaging Waste (94/62/EC) and CONEG (Coalition of North-eastern Governors)**

The grade conforms to amendments to 94/62/EC (Amendment number EU/2015/720, 2004/12/EC, 2005/20/EC, 219/2009). This grade meets the requirement of less than 100 ppm for total incidental Cadmium, Lead, Chromium, and Mercury.

### **Restriction of Hazardous Substances (RoHS) Directive 2011/65/EU**

The grade meets the requirements specified in EU directive 2011/65/EU, amended directive EU/2015/863 (RoHS 3), on the restriction of use of certain hazardous substances in electrical and electronic equipment.

We do not intentionally use or add any hazardous substances like Polybrominated biphenyl (PBB) or Polybrominated diphenyl ether (PBDE), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), bis-2-ethyl hexyl phthalate (DEHP), di-iso-butyl phthalate (DIBP), Lead (Pb), Mercury (Hg), Cadmium (Cd), Hexavalent Chromium (Cr<sup>6+</sup>), and/or its compound.



The product also does not contain other phthalates like diisooheptyl phthalate (DIHP), diisononyl phthalate (DINP), n-pentyl-isopentyl phthalate (PIPP), etc.

#### **ELV directive 2000/53/EC and its amendments**

According to the formulation of this product, the quantity of Cadmium, Lead, Chromium, and Mercury is below the limits given in Annex II (Note) of 2005/673/EC. As per the regulation after shredding 80% of the material should be recyclable.

The grade is manufactured from petrochemical feedstocks and does not contain any recycled polymers. Products made out of the grade are 100% recyclable. The grade does not contain any polymer and/or additives that render it oxo – degradable and/or bio – degradable/bio – compostable.

#### **Toy Standards**

The grade conforms with EN 71-3:2019, ISO 8124-3:2020, Toy safety 2009/48/EC (Annexure II, Part III “Chemical Properties”) and Applicable Parts ANNEX XVII of REACH including Phthalates. We do not intentionally use or add any hazardous substance like Lead (Pb), Antimony (Sb), Arsenic (As), Barium (Ba), Chromium (Cr), Cadmium (Cd), Mercury (Hg), Selenium (Se) and/or its compound. Also, substances that are classified as carcinogenic, mutagenic, or toxic for reproduction (CMR) of category 1A, 1B or 2 under Regulation (EC) No 1272/2008 are not used in this grade.

#### **California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)**

The grade presents no significant risk for cancer to the people of California. The grade contains no substance that has been included in the list of substances which cause reproductive toxicity at a level of exposure subject to the requirements of Proposition 65.

#### **Cosmetics Regulation**

The product does not contain any of the prohibited substance mentioned in Annex II/ III/ IV/ V/ VI of EU/1223/2009.

#### **Elemental Impurities**

The elemental impurities/ toxic solvents listed in the USP/ ICH residual solvents & class 1, class 2A and 2B, class 3 elements are not detected in the product. Class 1 (As, Cd, Hg, Pb); Class 2A (Co, Ni, V); Class 2B (Ag, Au, Ir, Os, Pd, Pt, Rh, Ru, Se, Ti); Class 3 (Ba, Cr, Cu, Li, Mo, Sb, Sn).

#### **Animal Derived Components (BSE) / (TSE) (EC 999/2001)**

The above grade is neither derived from animal or human origin nor manufactured utilizing intermediates and / or auxiliary agents which are of animal or human origin. The grade does not contain Bovine Spongiform Encephalitis (BSE) and Transmissible Spongiform Encephalitis (TSE). Hence the issue of Animal Spongiform Encephalopathy does not arise.

Therefore, our product is in accordance with the current revision of note for guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products (EMEA/410/01, rev.3- July 2011).

### **Nanomaterials**

During the manufacture of this product, we do not intentionally add or use any natural or synthetically produced nanomaterial as per definition set in 2011/696/EU.

### **Regulation EC/1895/2005**

BADGE (Bisphenol-A DiGlycidyl Ether), NOGE (novolac glycidyl ethers), BFDGE (Bisphenol-F DiGlycidyl Ether) and any other Bisphenol based substances/derivatives have not been used in the manufacture or formulation of this grade.

### **Polyhalogenated aromatics and ethers**

According to 76/769/EC, Polychlorinated biphenyls (PCBs) and polychlorinated terphenyls (PCTs) are not used in the manufacturing of this product. Also, polychlorinated naphthalenes (PCNs), polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs) and polybrominated terphenyls (PBTs) have not been used in the manufacture or formulation of this product.

### **BHT (butylated hydroxytoluene) (CAS no. 128-37-0) and BHA (butylated hydroxyanisole) (CAS no. 121-00-6 and 25013-16-5)**

According to the recipe of the product BHT and BHA are not used in the manufacture of this product, (the statement is true based on the testing done from laboratory with limit of quantification- LOQ 0.1 ppm).

### **Genetically Modified Organisms**

Herewith, we confirm that above grade manufactured by RIL does not originate from / neither contain genetically modified organisms, in other words they are GMO-FREE.

### **MOSH-MOAH Declaration**

This is to confirm that we do not add POSH, Mineral Oil Saturated Hydrocarbons (MOSH) or Mineral Oil Aromatic Hydrocarbons (MOAH) intentionally during the manufacturing of this grade.

### **Conflict Minerals**

The grade does not contain conflict minerals- Cassiterite, Columbite-tantalite (coltan), Gold, Wolframite, Tin, Tantalum, Tungsten, which are from Democratic Republic of Congo or its adjoining countries Sudan, Uganda, Rwanda, Burundi, United Republic of Tanzania, Zambia, Angola. This grade is not intentionally formulated or manufactured using above listed conflict minerals as per section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection act (2010).

### **Ozone Depleting Chemicals (ODCs)**

The ODCs listed in Annexes I and II of the Regulation EC/1005/2009, are not used in the manufacture of this product.

### **Persistent Organic Pollutants**

The grade does not contain Persistent Organic Pollutants (POPs) listed under Stockholm Convention (Annexure A, B, C and candidate chemicals), Rotterdam Convention (Annexure III and candidate chemicals) & EU POPs Regulation (EU) 2019/1021 (Annexure I to IV).

The grade does not contain fungicides, preservatives, fumigants & pesticides as listed in CAN/CGSB-32.311.

### **Residual Monomer**

As per testing, the following product does not contain residual monomer more than 100 ppm.

### **Food Allergens**

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The following list of allergens as per Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of this product:

- Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridised strains) and products thereof
- Peanuts, peanut oil or any peanut product
- Tree nuts such as almonds, Brazil nuts, chestnuts, hazelnuts, hickory nuts, macadamia nuts, pecans, pine nuts, pistachios and walnuts, grains
- Refined or unrefined oils
- Palm oil or Palm kernel oil or its derivatives or fraction
- Milk or milk products, dairy products, dairy derivatives, lactose with protein
- Eggs or egg products
- Soybeans, soy flour or any soy products
- Starch
- Sugars/ sweeteners: saccharin/ Aspartame/ Acesulfame potassium/ Hydrogenated glucose syrup/ Isomalt
- Fish or fish products, Shell fish, Crustaceans and Bivalve molluscs
- Yeast/ Yeast extracts
- Mustard and products thereof
- Sesame seeds and products thereof
- Molluscs or mollusc products
- Food colours
- Celery or celery products, Wheat or wheat products, Seeds or seed products, grains
- Aspartame
- Monosodium glutamate (MSG)
- Caffeine
- Hydrogenated vegetable protein (VHP)
- Lupin or lupin products
- Calamus/ calamus oil
- Cinnamon/ cinnamyl alcohol
- Citral/ citronellol
- Cocoa and cocoa derivatives
- Coumarin
- D/ L Limonene
- Eugenol
- Farnesol
- Isoeugenol
- Mesylate salts
- Nucleotides: E627 Disodium Guanylate/ E631 Disodium Inosinate/ E635 Disodium 5'-Ribonucleotides
- Preservatives (including Benzoate/ Parabens/ Sorbates)

### **Halal and Kosher Compliance**

We hereby confirm that the above grade does not contain any ingredient derived from animal (including pork) origin. The product does not contain ethyl alcohol and ethyl alcohol has not been used in the manufacturing process. The equipment used for manufacturing the product is not used for the manufacturing of products containing ingredients of animal origin. The product(s) manufactured by us are neither derived from animal or human origin nor manufactured utilizing intermediates and / or auxiliary agents which are of animal or human origin. Thus, the grade is Halal and Kosher compliant.

### **Substances and Chemicals**

Following substances have not been used intentionally in the manufacture or formulation of this product, however we have not analysed these substances or compounds:

- DMF (dimethyl fumarate)
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether)
- 2-(2H-1,2,3-Benzotriazol-2-yl)-4,6-di-tert-butylphenol
- 2-Mercaptobenzothiazole (MBT)
- Polycyclic Aromatic Hydrocarbons (PAHs)
- 1,2-dihydro-acenaphthene
- Acenaphthylene
- 9H-fluorene and anthracene
- Benz(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Benzo(e)pyrene
- Benzo(ghi)perylene
- Benzo(k)fluoranthene
- Chrysene
- Dibenz(a,h)anthracene
- Fluoranthene
- Fluorine
- Indeno(1,2,3-cd) pyrene
- Naphthalene
- Phenanthrene
- Pyrene
- Benzo(j)fluoranthene
- Organo-tin Compounds: Tributyl-tin (TBT), di-butyl tin (DBT), monobutyl-tin (MBT) or any other organo-tin compound
- Acrylamide, Acrylonitrile & Polyacrylonitrile (PAN)
- Aniline
- Aromatic Amines
- Asbestos
- Atrazine
- Barium
- Benzene
- Benzofuranes - Flame Retardants
- Benzophenone
- Benzyl alcohol
- Bisphenol-A, B, F, S
- Chlorine, Bromine
- Chlorofluorocarbon (CFC)
- Cobalt
- Copper
- Dioxins
- Ethyl alcohol
- Halogenated Flame Retardants
- Indium
- ITX Photoinitiators
- Lithium
- Melamine
- Mercury
- Molybdenum
- Naphthalene
- N-Nitrosamines and N-Nitrosatables Tris(4- nonylphenyl, branched and linear) phosphite (TNPP), 4-Nonylphenol (4NP) and nonylphenol ethoxylates
- Nickel
- Osmium
- Palladium
- Paraben
- Plasticisers
- Platinum
- Polynuclear aromatic hydrocarbons (PNA)/ Polycyclic Aromatic Hydrocarbons (PAH)
- Per- and polyfluoroalkyl substances (PFAS), Perfluorooctanesulfonic acid (PFOA) and Perfluorooctane sulfonate (PFOS)
- Polybrominated Terphenyls (PBTS)
- Recycled materials
- Radioactive substances
- Rhodium
- Ruthenium
- Silicone
- Silver
- Styrene and polystyrene
- Sulphur
- TAA adhesion promoters
- Thallium
- Natural rubber latex, natural rubber or synthetic Latex
- Nitrile rubber
- Chloroprene rubber
- Pyridine
- Gamma Picoline
- Beta Picoline
- Morpholine
- Selenium
- Sodium Sulphide
- Potassium Carbonate Acetone
- Phosphorous Trichloride
- Phosphorous Pentachloride
- Phosphorous Oxychloride

- Hydrogen Peroxide
- Sodium Formaldehyde Sulphoxylate
- Sodium Tripolyphosphate
- Sulphur dioxide and sulphite
- Precipitated Barium Carbonate
- Ethylene oxide
- Propylene oxide
- Polycarbonate
- Acrylonitrile Butadiene Styrene (ABS)
- Styrene acrylonitrile resin (SAN)
- Polyoxymethylene (POM)
- Volatile Organic Compounds (VOC)
- Methylmethacrylate (MABS)
- Rigid aminoplast thermosets like UF, MUF, PF etc.
- 2,4-pentanedione
- 2-ethylhexanoic acid
- 2-phenylphenol
- 4-methylbenzophenone
- 4,4'-Bis(diethylamino)benzophenone (DEAB)
- Alkylphenols and alkylphenol ethoxylates
- Anthraquinone
- Mica
- Azo colorants/pigments
- Azodicarbonamide
- Benzene
- Benzophenone
- Chlorinated Solvents
- Chlorobenzenes
- Chlorophenols
- "Colourants based on and compounds of antimony, arsenic, cadmium, chromium (VI), lead, mercury, selenium
- Epoxy silanes including GLYMO and GLYEO
- Ethyleneimine (=aziridine)
- Glycol ethers of E list and the beta-isomers of the P list including their acetates
- Hydroquinone
- Isopropyl-thioxanthone; (2-ITX & 4-ITX isomers)
- Linear Alkylbenzenes, defined as benzene with linear alkyl (C10-C13) chain
- Michler's ketone
- Nonylphenols (linear and branched nonylphenols)
- Novolac glycidyl ether (NOGE)
- Organotin compounds
- Perchloric acid
- Perfluorooctanes (and their salts)
- Polystyrene (PS)
- Recycled paper
- Rhodamine derivatives - based pigments
- Semicarbazide
- Sulfonamide type plasticisers (e.g. NETSA)
- Titanium diisopropoxide bis(acetylacetonate); (Titanium acetylacetonate (TAA))
- Toluene
- Tris(nonylphenyl)phosphite (TNPP)
- Wax
- Odor causing substances
- Hazardous Air Pollutants – Section 112(b) of the US Clean Air Act
- Jatropa Oil
- Tertiary Butylhydroquinone (TBHQ)

Following solvents are not present in the above-mentioned product:

- Isopropyl acetate
- Methyl Ethyl Ketone (MEK)
- N-propyl acetate
- Diethyl ether
- Ethyl formate
- Methyl formate
- Tert-butyl methyl ether
- Methyl-1-propanol
- Isobutyl acetate
- p-xylene
- m-xylene
- o-xylene
- Isoamyl acetate

***Disclaimer:*** The declarations given above are applicable to the material as it leaves the RIL production facilities and does not include any substance subsequently added by the converter or any other agency. As the conditions of usage at the customer's place are beyond the control of RIL, Customers are advised to make their own decision regarding their use of our grade is safe, lawful, and suitable for the intended applications.

***(Computer generated statement, hence does not require any signature)***