

Films Business

PRODUCT SAFETY BULLETIN

Bicor™ AXT w PU Primer

U.S. Regulatory Information

Food Contact Status (FDA)

This product for food packaging applications is produced with olefin polymers which have been certified by our suppliers to be in compliance with the Federal Food and Drug regulations under 21 CFR 177.1520. Similarly, the coatings used to produce this product are in compliance with 21 CFR 175.320. As such this product may be used with all food types (FDA's Food Types ALL) under Conditions of Use C ("Hot filled or pasteurized above 150°F") through H² ("Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use.").

If food type or contact temperature conditions differ from those cited above, please contact your Jindal Films representative for further information. This letter applies to all gauges of the aforementioned Jindal Films product

¹ See 21 C.F.R. § 176.170(c), Table 1.

² See 21 C.F.R. § 176.170(c), Table 2.

Heavy Metals, Coalition of Northeastern Governors (CONEG), California Toxics in Packaging Prevention Act

This packaging film and packaging components complies in all respects with the limitations on heavy metals identified in the CONEG (Coalition of Northeastern Governors) Model Legislation and California Toxics in Packaging Prevention Act: namely the sum of the concentrations of the following heavy metals,

- mercury, lead, cadmium and hexavalent chromium,

in this product does not exceed 100 parts per million by weight.

PROP 65 (California Proposition 65), The Safe Drinking Water & Toxic Enforcement Act of 1986

This product as supplied to you for your intended use, contains no substances present at any level that is, under the California Safe Drinking and Toxic Enforcement Act of 1986 (Proposition 65), characterized as known to the State of California to cause cancer or to be a reproductive toxicant.

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Food and Drug Administration's (FDA) Establishment and Maintenance of Records Under the Public Health Security and Bioterrorism and Response Act of 2002

Jindal Films has been advised by our outside counsel that Jindal Films' obligations under the regulations are limited to making existing records available upon request to FDA. Jindal Films maintains such records as part of routine business activities.

Food Allergens

See page 4 for U.S. allergens.

European Regulatory Information

Food Contact Status (Europe)

The product has not been evaluated with regards to EU-Framework Regulation on materials and articles intended for Food Contact: Reg (EC) No 1935/2004 and in particular versus REG (EC) No 10/2011 on plastic materials and articles intended to come into contact with food.

REACH

Since this product is an "article" under REACH, there is only a need to take action under REACH if the film either contains a "Substance of Very High Concern" at >0.1% wt or contains a substance which is intended to be released during use. None of these products will fall into either of these categories. This product has been evaluated concluding that there is no obligation under REACH relating to the use of this product. Nevertheless we have pre-registered all imported substances that enter in the composition of the articles and have inquired that our suppliers have pre-registered the substances manufactured in EU.

Waste packaging Directive – EU

In accordance with the Essential requirements of the Directive 94/62/EC and its amendments up to and including 2005/20/EC, film is in conformity with EN 13427 requiring prevention and recovery (one form required):

- EN13428 -Prevention by source reduction-Compliant

-Heavy metals and other noxious/hazardous substances
(CR 13695-1 and CR 13695-2)-Compliant

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- EN13429 -Reuse-Optional-NA
- EN13430 -Recovery with material recycling-NA

- EN13431 -Recovery in the form of energy-Compliant.
Calorific gain of Polypropylene: 24MJ/Kg

End of Life Vehicle (ELV) EU Directive 2000/53/EC/IMDS

This product, when used for labelling vehicles' parts, are not in the scope of :

Directive 2000/53/EC on end-of life vehicles (ELV)

As such and as converted into labels, films do not need to be IMDS registered. This product does not contain substances listed in GADSL (Global Automotive Declarable Substance List) above the reporting limits nor any declarable IMDS and VDA 232-101(List of Declarable Materials in Automotive Manufacturing) substance.

RoHS (Restriction of the use of certain Hazardous Substances) – WEEE (Waste Electrical and Electronic Equipment)

This product is in compliance with the relevant heavy metals and flame retardant requirements of the following regulation:

Directive 2011/65/EC and its subsequent amendments, on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS).

The concentrations of the following heavy metals (lead, cadmium, mercury & hexavalent chromium) and flame retardants [polybrominated biphenyls (PBBs) & polybrominated diphenyl ethers (PBDEs)] in this product do not exceed 0.1% by weight for lead, mercury, hexavalent chromium, PBBs, & PBDEs and 0.01% by weight for cadmium.

Directive 2002/96/EC and its subsequent amendments, on waste electrical and electronic equipment (WEEE).

Framework Resolution ResAP(2004)1 on Coatings Intended to Come into Contact with Foodstuffs

This product is in compliance with the specifications of the following regulation:

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- Framework Resolution ResAP(2004)1 on Coatings Intended to Come into Contact with Foodstuffs relating to transfer of coating constituents and the use of Good Manufacturing Practices (GMP).

Directive 1999/45/EC concerning the Classification, Packaging and Labeling of Dangerous Preparations

The above directive does not apply to this product.

Food Allergens

The following food allergen substances (as listed in Annex IIIa of EC Directive 2003/89/EC amending EC Directive 2000/13/EC as regards indication of the ingredients present in food stuffs, also applicable for US produced films),

- Cereals containing gluten (i.e., wheat, rye, barley, oats, spelt, kamut or their hybridized strains) and products thereof,
- Crustaceans and products thereof,
- Eggs and products thereof,
- Fish and products thereof,
- Peanuts and products thereof,
- Soybeans and products thereof,
- Milk and products thereof (including lactose),
- Nuts, i.e., Almond (*Amygdalus communis* L.), Hazelnut (*Corylus avellana*), Walnut (*Juglans regia*), Cashew (*Anacardium occidentale*), Pecan nut (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nut (*Bertholletia excelsa*), Pistachio nut (*Pistacia vera*), Macadamia nut and Queensland nut (*Macadamia ternifolia*), and products thereof,
- Celery and products thereof,
- Mustard and products thereof,
- Sesame seeds and products thereof, and
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/liter expressed as SO₂,

are not intentionally used by Jindal Films in this product and there is no reason to expect any of these materials to be present. In addition, we do not believe any of these materials are present in our manufacturing process and therefore do not test for their presence in this product.

Further, while we do not believe that any of these materials are present in the individual components contained in this product, we do not have definitive information from our suppliers of these components, and we do not test them for the presence of any of these materials.

ASTM F-963 and EN 71/3 Safety of toys: Migration of certain elements

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In accordance with the requirements of ASTM F-963 and EN 71/3 concerning the safety of materials for use in toy manufacture, this product is certified to have metal and organotin contents within the required limits for the applicable toys materials category III (scrapped off material):

ALUMINUM (Al) 70 000 mg/kg
ANTIMONY (Sb) 560 mg/kg
ARSENIC (As) 47 mg/kg
BARIUM (Ba) 56 000 mg/kg
BORON (B) 15 000 mg/kg
CADMIUM (Cd) 17 mg/kg
CHROMIUM III 460 mg/kg
CHROMIUM VI 0.2 mg/kg
COBALT (Co) 130 mg/kg
COPPER (Cu) 7 700 mg/kg
LEAD (Pb) 160 mg/kg
MANGANESE (Mn) 15 000mg/kg
MERCURY(Hg) 94 mg/kg
NICKEL (Ni) 930 mg/kg
SELENIUM (Se) 460 mg/kg
STRONTIUM (Sr) 15 000 mg/kg
ORGANIC TIN 12 mg/kg
ZINC (Zn) 46 000 mg/kg

The individual levels of metals in our products tested at a certified laboratory are under the below limits:

ANTIMONY (Sb) < 0.5 mg/kg
ARSENIC (As) < 2.5 mg/kg
BARIUM (Ba) < 1.0 mg/kg
BORON (B) < 0.5 mg/kg
CADMIUM (Cd) < 0.1 mg/kg
CHROMIUM III < 2.0 mg/kg
CHROMIUM VI < 0.1 mg/kg
COBALT (Co) < 0.1 mg/kg
COPPER (Cu) < 0.2 mg/kg
LEAD (Pb) < 0.5 mg/kg
MANGANESE (Mn) < 0.5 mg/kg

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MERCURY (Hg) < 0.2 mg/kg
NICKEL (Ni) < 1.0 mg/kg
SELENIUM (Se) < 0.1 mg/kg
STRONTIUM (Sr) < 0.5 mg/kg
TIN (Sn) < 1.0 mg/kg
ZINC (Zn) < 20 mg/kg

We can guaranty also that, on metallized film,

ALUMINUM (Al) < 5 000 mg/kg

The Consumer Product Safety Improvement Act (CPSIA) and Federal Hazardous Substances Act (FHSA)

This packaging film and packaging components complies in all respects to all applicable CSPIA and FHSA product safety rules.

Canadian HPFB (Health Product Food Branch) & CFIA (Canadian Food Inspection Agency) LNOs (Letters of No Objection)

A copy of a Canadian Food Inspection Agency Letter of No Objection* is available upon request.

* Contact your Jindal Films sales representative for additional information

An application is submitted to Health Product Food Branch for a Letter of No Objection.

Canadian EPA Batches 1-12

None of the ingredients or sub-ingredients in this film are included in Environment Canada's December 2009 list of substances proposed for delisting from the Canadian Environmental Protection Act (CEPA) Domestic Substances List (DSL).

General Information

Chemical Control Information

This product is listed on the following inventories or is exempt from the listing/notification requirements:

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• Asia Pacific

Australia - Australian Inventory of Chemical Substances (AICS)
China – Chinese Inventory of Existing Chemical Substances (IECSC)
Japan – Japanese Existing and New Chemical Substances (ENCS)
Korea - Korean Existing Chemicals List (KECL)
Philippines – Inventory of Controlled Chemical Substances

• Europe

Europe – European Inventory of Existing Commercial Chemical Substances (EINECS)*
OR
Europe – European List of Notified Chemical Substances (ELINCS)

*Polymers are not specifically listed on EINECS. However, the monomers are listed on EINECS and any polymer that is made from listed monomers is considered notified.

• North America

Canada - Canadian Domestic Substance List (DSL)
United States of America - Toxic Substance Control Act (TSCA)

Kosher

We use conventionally manufactured ingredients, including certain animal-based fatty acids, in the production of our products. These ingredients are highly processed chemicals which comply fully with all laws and regulations administered by the Food and Drug Administration (FDA) and all other regulatory agencies. Furthermore, our products are manufactured in conformance to the high standards of Good Manufacturing Practices. We are therefore certain that they are in all respects safe and appropriate for their specific use from a regulatory perspective. Moreover, it is our current belief that the products we supply for your packaging needs may not adversely affect the Kosher status of your products. The availability of Kosher certification for food products packaged in Jindal Films films could depend on which certifying agency you consult.

Ozone Depleting Substances

No Class I or Class II Ozone-Depleting Substances are used in the manufacture of this product.

Some of these substances may be used at some manufacturing sites, but only in direct support of manufacturing; e.g., as refrigerants and in fire suppression systems which the U. S.

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Environmental Protection Agency defines as non-contact incidental uses and exempt from the labeling requirements.

Film is produced and composed in conformity with Regulation (EC) No 2037/2000 of the European Parliament and of the Council of 29 June 2000 on substances that deplete the ozone layer.

Other

The following materials are not intentionally used by Jindal Films in this product and there is no reason to expect any of these materials to be present. In addition, we do not believe any of these materials are present in our manufacturing process and therefore do not test for their presence in this product. Further, while we do not believe that any of these materials are present in the individual components contained in this product, we do not have definitive information from our suppliers of these components, and we do not test them for the presence of any of these materials.

Amines

Animal Derived Material

Asbestos

Benzene

Benzophene

Benzotriazoles

Beryllium compounds

Bisphenol A

Bisphenol S

Brominated compounds

Dimethyl Fumarate (DMF)

Dioxin

Hexabromo cyclododecane (HBCD)

Hexabromo cyclododecane (HBCDD)

Lignin

Natural Rubber

Dry Rubber Latex

Nonylphenol, 4-Octylphenol, and Nonylphenoethoxylates

Organotins (Dibutyltin (DBT) Compounds, Dioctyltin (DOT) Compounds)

Perfluorooctane sulfonate (PFOS) & Perfluorooctanoic acid (PFOA)

Phenol

Polynuclear Aromatic Hydrocarbons (PNA/PAH)

Polybrominated Biphenyls (PBBs)

Polybrominated Diphenyl Ethers (PBDEs)

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Polybrominated Terphenyls (PBTs)
Polychlorinated Biphenyls (PCBs)
Polychlorinated Terphenyls (PCTs)
Sulfur
Toluene diisocyanate (TDI)
Vinyl Chloride

Recyclability*

OPP films can be disposed of through normal recycling and refuse handling systems, except PVdC coated films where special additives have to be added during the recycling process to neutralize the liberated chlorine. They are not categorized as "Special Waste" in Europe. OPP films are suitable for incineration where they burn cleanly and with high-energy yield to produce only carbon dioxide and water. PVdC coated films yield small quantities of hydrogen chloride.

* Contact your Jindal Films sales representative for additional information concerning OPP and the environment.

Validity

This document is valid for two years after the date of issuance, or until a change in the relevant legislation or regulation, if this occurs sooner than two years.

Date of Issuance: October 1, 2015