

Films Business
PRODUCT STEWARDSHIP BULLETIN
Oppalyte™ MO747

European Regulatory Information

Food Contact Status (Europe)

This article complies with the following legal requirements or recommendations:

1. Generally

EU-Framework Regulation on materials and articles intended for Food Contact: Reg (EC) No 1935/2004.

Further in the packaging chain, the final converter has to assure the compliance with the Regulation.

2. Raw Materials / Composition

Furthermore, Jindal Films confirms that the materials utilised in the production of Oppalyte MO747 packaging film have been certified by the suppliers as complying with the requirements (legislations, recommendations) of each EU member state, Norway, the European Union and the USA for use in direct contact with foodstuffs.

3. Conditions of use / Compliance with threshold values

- Types of food intended to come into contact with the film : All
- Duration and temperature of treatment and storage while in contact with food:
10days, 40°C, tested

Please contact your Jindal Films representative for further information. This declaration applies to all gauges of the aforementioned Jindal Films product

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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.

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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

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(Proposition 65), characterized as known to the State of California to cause cancer or to be a reproductive toxicant.

General Information

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

Candidate List of Substances for Eventual Inclusion in Authorization process

Based upon the information currently available, we have no evidence that the Jindal Films films contain any of the substances referenced in the official Candidate list of SVHCs published on June 15, 2015 ECHA, for inclusion on the Annex XIV List of Substances subject to Authorization at > 0.1 wt %.

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

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(CR 13695-1 and CR 13695-2)-Compliant

- 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 2012/19/EU and its subsequent amendments, on waste electrical and electronic equipment (WEEE)

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

The above directive does not apply to this product.

Food Allergens

With reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the EU Directive 2003/89/EC and its subsequent amendments - the following food allergens or products derived thereof are not intentionally introduced (**) for the manufacture of our films

- Cereals containing gluten 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 (incl. Lactose)
- Nuts and products thereof
- Celery and products thereof
- Lupin and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO₂
- Molluscs and products thereof

Consequently our product(s) may reasonably be expected not to contain allergenic proteins.

Our company has also taken all precautions in accordance with Good Manufacturing Practice to prevent unintentional contamination of our product(s) with food allergens.

(**) “Intentionally introduced” shall mean: “deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristic, appearance or quality (EU Commission Decision 2002/525/EC)

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EN 71/3 Safety of toys:

In accordance with the requirements of EN 71/3 concerning the safety of materials for use in toy manufacture, this product is certified to have metal and organo-tin contents within the required limits:

EN 71/5 Safety of toys:

In accordance with the requirements of EN 71/5 concerning the safety of materials for use in toy manufacture, the film do not contain substances and preparations classified as dangerous by the definitions in Directives 67/548/EEC and 88/379/EEC

Chemical Control Information

Suppliers of raw materials contained in this article have declared that the substances of their materials are on the following inventories or are exempt from the listing/notification requirements:

• **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)

• **Europe**

European Inventory of Existing Commercial Chemical Substances (EINECS)*

OR

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

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As a result of extensive inquiries and investigations with our suppliers, but also with our legal consultants, and, in addition, with recognized experts in Rabbinical law, we do not believe the status of the laws governing Kosher foods is settled enough to permit us to respond as directly as we would like to your question. What we have learned is that there is even a critical difference of opinion among these experts as to what is properly designated "animal-derived" for the purpose of enforcement of the special dietary laws of interest to you. Perhaps this and other issues will be resolved in some way in the long term, but that is not the case now, nor are we aware of any way in which the divergence of opinions can be harmonized in the immediate future.

Under these circumstances, all we can advise you is that 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

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

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

Benzene - CAS 71-43-2

is not intentionally used by Jindal Films in films. Although films are not routinely tested for its presence, based on composition knowledge, this substance is not expected to be present. However, the fact that these substances are not intentionally used by Jindal Films in films does not exclude that trace levels of the substances may be present as a

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result of the specific characteristics of the raw materials and/or of the manufacturing process.

Benzene is an environmental pollutant which is principally emitted from petrol through exhaust gases.

The available data do not allow the establishment of a safe level of exposure.

There is a suspicion that small amounts of benzene could be retained in polyolefin resins. Therefore, we have tested our polypropylene resins for residual benzene at an accredited lab. GC/FID analyse gave results all lower than detection limit of 0.1mg/Kg of resin.

It is then reasonable to expect that films do not contain residual benzene at a concentration higher than 0.1ppm.

Phthalates

Jindal Films does not intentionally use phthalates/adipates for the composition of Bicolor™, Label-Lyte™, OPPalyte™, Metallyte™ and Digilyte™ films.

Nevertheless some of the olefinic raw materials used in the production of OPP films may contain traces of phthalates, used as processing aid in the catalytic process. Those used by our suppliers are in accordance with Commission Decision 1999/815/EC and applicable legislations on food contact.

Residual levels of phthalates in film are extremely low as polypropylene resins only have traces of phthalates (*). For polyolefin materials, primarily polypropylene, which are used in Jindal Films' production process, testing has resulted in the identification of an overall residual phthalate content of no more than 10-15 parts per million. Further testing with food simulants (per EU Regulation 10/2011/EC) has resulted in phthalates not being detected at a sensitivity of 20 parts per billion (0.02 parts per million).

(*) DIBP (CAS# 84-69-5) is used as a "technical support agent" in the process of the manufacturing of polypropylene. Some other phthalates (like DBP or DEHP) may be present as impurities in the "technical support agent" and catalyst system.

Substances in film

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

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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.

- Acetylacetone (2,4 Pentanedione) - CAS 123-54-6
- Acrylamide (2-propenamide) - CAS 79-06-1
- Adipates
- Alcanes, C10-13, chloro (Short-chained chlorinated paraffins) - CAS 85535-84-8
- AlkylPhenols
- Anthraquinone - CAS 84-65-1
- Antimony trioxide – CAS 1309-64-4
- Aromatic amines
- Aromatic Hydrocarbons (BTEX)
- Asbestos – CAS 1332-21-4
- Azo compounds
- Azodicarbonamide or azo-carbazide compounds
- Benzophenone - CAS 119-61-9
- Benzophenone,hydroxybenzophenone and 4-methyl benzophenone
- Benzotriazoles
- Bisphenol A (BPA) - CAS 80-05-7
- Bisphenol C (BPC) - CAS 79-97-0
- Bisphenol F (BPF) - CAS 87139-40-0
- Bisphenol S (BPS) - CAS 80-09-1
- Blowingagents
- Bromo-aromatics
- ButylHydroxyAnisole(BHA)-CAS: 25013-16-5
- Canadian Environmental Protection Act (CEPA)
Batches I,II,III,IV,V,VI,VII,VIII, IX,X,XI,XII
- Chloro-Aromatics
- Chloroform – CAS 67-66-3
- ChloroFluoroCarbons (CFC)
- Decabromodiphenylether – CAS 1163-19-5
- Dicyandiamid - CAS 461-58-5
- Di(ethylhexyl) adipate (DEHA) – CAS 103-23-1
- Di(ethylhexyl) maleate (DEHM) – CAS 142-16-5
- Dimethyl Fumarate (DMF) – CAS 624-49-7
- Dioxins and Furans
- DiisopropylNaphtalene (DIPN) - CAS 24157-81-1
- Endocrine disruptors
- Epoxidized Soybean Oil (ESBO)-CAS 8013-07-8

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Films Business
PRODUCT STEWARDSHIP BULLETIN**Oppalyte™ MO747**

- Ethylhexanoic Acid (2-EHA) – CAS 149-57
- Ethylhexyl acrylate – CAS 103-11-7
- Flame retardant
- Fluorescent Brightening Agents (FBA)
- Fluorescent Wightening Agents (FWA)
- Formamide – CAS 75-12-7
- Genitically modified organisms (GMO)
- Glycol Ethers
- Halogens
- Hydroxybenzophenone - CAS 1137-42-4
- Isopropyl Thioxanthone (ITX) – CAS- 5495-84-1
- Latex &natural rubber
- Methanol – CAS 67-56-1
- Methylbenzophenone - CAS 134-84-9
- Mineral Oils
- N-ethyl (ortho/para)toluenesulphonamide (NETSA) – CAS 8047-99-2
- Nitrofurazone – CAS 59-87-0
- Nonylphenol Ethoxylate
- Optical Brightening Agents (OBA)
- Organotin compounds
- Orthophenylphenol (OPP) - CAS 90-43-7 and its salts
- Padimate ; 2-ethylhexyl 4-(dimethylamino)benzoate CAS:21245-02-3
- Palm oil – CAS 8002-75-3
- Parabens
- Paraffinic substances
- Pentachlorophenol - CAS 87-86-5
- Perchlorate - CAS 14797-73-0
- Perfluorinated Carboxylic Acids
- Perfluorinated tenside (PFT)
- Perfluoro-alkyl sulfonate(PFAS)
- Perfluorochemicals (PFCS)
- Perfluoro-octanoic acid (PFOA) – CAS 0335-67-1
- Perfluoro-octanyl sulphonate(PFOS) – CAS 1763-23-1
- Persistent Organic Pollutants (POP)
- Plasticizers
- Polybrominated biphenyls (PBBs)
- Polybrominated diphenyl ethers (PBDEs)
- Polychlorinated biphenyl (PCB) – CAS 1336-36-3
- Polychlorinated naphthalenes (PCNs)
- Polychlorinated triphenyl (PCT) – CAS 61788-33-8

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Films Business

PRODUCT STEWARDSHIP BULLETIN

Oppalyte™ MO747

- Polycyclic Aromatic Compounds (PAC)
- Polycyclic Aromatic Hydrocarbons (PAH)
- Polyethylene glycol - (PEG) – CAS 25322-68-3
- Polyfluoroalkyl phosphate esters
- Polyfluorinated telomers
- Polyoxymethylene (POM) – CAS 9002-81-7
- Polyvinyl Chloride(PVC) – CAS 9002-86-2
- Quaternary ammonium compounds
- Rosin (Colophony) – CAS 8050-09-7
- Softeners
- Styrene – CAS 100-42-5
- Sulfur – CAS 7704-34-9
- Synthetic nanoparticles
- Titanium Acetyl Acetone (TAA)
- Toluene - Cas number: 108-88-3
- Triclosan – CAS 3380-34-5

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.

Validity

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

September 2015

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