

January 19, 2022

David.d  
Ponci trading Ltd  
Room 908, JiaZheng International Building, No.28, Moyu Road,  
Anting Town, Jiading District, Shanghai 201805,P.R.C



***Petrothene NA480178***

A product of Equistar Chemicals, LP

Dear David.d:

The following is in response to your request for Product Stewardship Information (PSInfo) for the product listed above. The attached Product Stewardship Bulletin (PSB) details the regulatory status of this product.

LyondellBasell Industries responds to product stewardship requests with a standardized Product Stewardship Bulletin (PSB) which summarizes the global regulatory status of a product. LyondellBasell Industries will not complete customers' forms or questionnaires. Standardized responses provide each customer with consistent information in a timely fashion. Each request is reviewed to ensure our response documents provide relevant information.

Please note that compliance with these regulations should not be interpreted to guarantee that the product, will, in fact, perform in a particular application. Your Technical Service Representative can help you determine that the characteristics of the product are compatible with the desired conditions of use.

Should you have any further questions concerning a LyondellBasell product, or if we can assist in any other way, please do not hesitate to contact us.

Best regards,

A handwritten signature in black ink, appearing to read 'Rafal Kozlowski'.

Rafal Kozlowski  
Product Steward  
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## Product Stewardship Bulletin



### ***Petrothene NA480178***

A product of Equistar Chemicals, LP

#### **Global Food Contact Status:**

##### **European Union**

This product complies with the relevant requirements of Regulation 1935/2004/EC (Framework Regulation) as applicable to intermediate materials (e.g. plastic powders, plastic granules or plastic flakes).

This product complies with the relevant requirements of Regulation 2023/2006/EC (GMP) and as amended, applicable to intermediate materials (e.g. plastic powders, plastic granules or plastic flakes).

This product complies with the relevant requirements of Regulation 10/2011/EC (PIM) as amended, applicable to intermediate materials (e.g. plastic powders, plastic granules or plastic flakes).

The monomers and additives used to produce this product are listed in the Union List of Authorized Substances of Regulation 10/2011/EC and subsequent amendments.

EU Regulation 10/2011/EC specifies 10 mg/dm<sup>2</sup> as the maximum overall migration (OML) from the finished plastic food contact material or article. The OML and SMLs (when applicable) should be determined according to the requirements specified in EU Regulation 10/2011/EC and subsequent amendments. The OML and SML determinations are the responsibility of the manufacturer of the finished plastic food contact material or article. In addition, we remind you that the manufacturers of the finished food contact material or article must verify that the finished material or article, manufactured according to good manufacturing practices, does not modify the organoleptic properties of the food.

##### SML Components

This product contains one or more components with Specific Migration Limits (SMLs).

10120; Acetic acid, vinyl ester, or Vinyl acetate, or VAM; SML = 12 mg/kg

74400; phosphorous acid, tris(nonyl-and/or dinonylphenyl) ester; SML = 30mg/kg.

This product contains traces of a substance which is regulated with a specific migration limit in EU (Commission Regulation 10/2011; Annex II). Migration tests showed a migration level significantly below the SML, thus exceeding this SML under foreseeable conditions of use involving food contact is not expected.

SML = 1 mg/kg (expressed as Aluminium)

#### Dual Use Additives

Dual use additives, as defined in Regulation 10/2011/EC, are not intentionally used in the manufacture or formulation of this product.

#### **United States**

Ethylene-vinyl acetate copolymers may be safely used as articles or components of articles intended for use in producing, manufacturing, packing, processing, preparing, treating, packaging, transporting or holding food, in accordance with the following prescribed conditions.

As described in 21 CFR 177.1350 (b)(1), clearance of EVA copolymers for food contact applications depends on meeting extraction criteria which are dependent upon the type of food being contacted and the conditions of time and temperature characterizing their intended use. Due to the wide range of potential applications, the end user should determine that the physical properties of the resin are compatible with their intended use and the extraction limitations are met. The food types and the conditions of time and temperature characterizing the conditions of intended use are described in Tables 1 and 2 of 21 CFR 176.170(c).

This product may contain adjuvant substances that may be safely used in polymers used for the manufacture of articles that come into direct contact with food. According to our information, these substances used in this product meet the requirements of their respective FDA regulations, FCNs, and 21 CFR 177.1520(b).

#### **Allergen Statements**

##### **Allergen - General**

This product contains no identified allergenic materials including:

Cereals containing gluten or products of these, wheat or wheat products  
Dairy or dairy products, egg or egg products  
Peanut or peanut products, soybean or soybean products  
Tree nut or tree nut products, seed or seed products  
Fish or fish products, shellfish or shellfish products  
Phenylalanine, tartrazine  
Sugar, monosaccharides or disaccharides, modified cornstarch, yeast  
Preservatives, artificial color, artificial flavor, sulfur dioxide or sulfites

No identified allergenic materials are present in the manufacturing facility and the product is manufactured in dedicated equipment.

##### **Allergen - Food Allergen European Regulation 1169/2011**

The food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of this product. However, this product has not been tested for these substances.

### **Allergen - Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA)**

No major food allergens (e.g., Milk, Eggs, Fish, Crustacean Shellfish, Tree Nuts, Wheat, Peanuts, Soybeans, Sesame Seeds, Sulphites) nor protein derived from them are used in the formulation or manufacture of this product. However, this product has not been tested for these substances.

### **Biomedical Policy**

This product(s) may not be used in:

(1) U.S. FDA Class III, Health Canada Class IV, and/or European Class III Medical Devices; or (2) applications involving permanent implantation into the body.

Prior written approval for each specific product and application must be given by LyondellBasell before this product(s) is used in any:

(1) U.S. FDA Class I, Health Canada Class I, and/or European Union Class I Medical Devices; (2) U.S. FDA Class II, Health Canada Class II or Class III, and/or European Union Class II Medical Devices; (3) film, overwrap and/or product packaging that is considered a part or component of one of the aforementioned Medical Devices; or (4) packaging in direct contact with a pharmaceutical active ingredient and/or dosage form that is intended for inhalation, injection, intravenous, nasal, ophthalmic (eye), digestive, or topical (skin) administration

All references to U.S. FDA, Health Canada, and European Union regulations include other country's equivalent regulatory classifications.

LyondellBasell may further prohibit or restrict the sale of its products into certain applications. For further information, please contact a LyondellBasell representative or visit the LyondellBasell website at: <https://www.lyondellbasell.com/en/products-technology/product-safety-stewardship/>

### **Epoxy Derivatives**

The materials BADGE, BFDGE or NOGE are not intentionally added in this product as referenced in Commission Regulation 1895/2005/EC, on the use of certain epoxy derivatives in materials and articles intended to come into contact with foodstuffs as plasticizers, additives or raw materials.

### **California Prop 65**

Please refer to the US SDS for communications regarding California Proposition 65.

### **CEPA Challenge Program**

Articles made from this product are not expected to contain any materials in the CEPA Challenge Program Lists 1 through 12 at levels that would trigger reporting when the items are imported into Canada.

### **CLP Regulation (EC) No. 1272/2008**

CLP Regulation (for "Classification, Labeling and Packaging") Regulation (EC) No 1272/2008, aligns the European Union system of classification, labeling and packaging of chemical substances and mixtures to the Globally Harmonized System (GHS).

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC (for dangerous substances) and 1999/45/EC (for dangerous preparations), and amending Regulation (EC) No 1907/2006.

See Product's European SDS at <http://www.lyondellbasell.com> for classification and labeling of chemicals which are legally binding within the EU.

### **Composition**

For compositional information on our products, please consult the appropriate regional SDS and Sales Specification or Technical Data Sheet which are available on the LyondellBasell Product Documents site at <https://productsafety.lyondellbasell.com>. We do not routinely analyze for materials not listed on a product's Sales Specification or Technical Data Sheet. We do not test for materials not reasonably expected to be present in our products.

### **FDA Code of Federal Regulations (CFR) References**

The use of this product in food or food-contact materials is controlled by the following regulations. These CFR sections should always be consulted for the complete context before any conclusion is made as to the allowed regulated use. Please note that compliance with this regulation should not be interpreted to guarantee that the material can, in fact, be used for a given application. The user should determine that the physical properties and purity of the material are compatible with the desired conditions of use.

### **Genetically Modified Organisms (GMO)**

This product is manufactured by a synthetic process and no materials of plant or animal origin are incorporated as raw materials, processing aids or additives.

This product is not considered or derived from a genetically modified organism as defined by the EC directives 1830/2003/EC on labeling and traceability and 1829/2003/EC on genetically modified food and feed and any amending legislation.

### **Kosher Certification**

This product is not certified Kosher. The additives and ingredients used to manufacture this resin are Kosher certified or derived from non-animal sources. The use of this resin should have no adverse impact on the Kosher status of your customer's food product and you should anticipate no difficulty in obtaining Kosher certification with use of the above listed product.

## **Latex**

No materials containing latex or natural rubber are used in the manufacturing, handling and packaging processes for this product.

## **Metals Content**

### **US CONEG**

Based on the available documentation provided by our raw material suppliers, this product complies with the CONEG Model Legislation for requirements regarding the defined limit for the sum of heavy metals (lead, mercury, cadmium and hexavalent chromium).

### **EU Packaging and Packaging Waste**

Based on the available documentation from raw materials suppliers, this product complies with the directive 94/62/EC and as amended concerning the defined limit(s) of heavy metals.

### **Restriction of Hazardous Substances in Electric and Electronic Equipment (RoHS)**

RoHS Regulation refers to electrical and electronic equipment and not specifically to plastic raw materials. However, based on the available documentation from raw materials suppliers, this product complies with the requirements of the Directives 2002/95/EC and 2011/65/EU, as amended, concerning the limits of cadmium, lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl)phthalate (DEHP), butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP).

### **Ozone Depleting Substances**

#### **European Union**

The ozone-depleting substances (ODS), listed in the Annexes I & II of the Regulation ( EC ) No 1005/2009 of 16 September 2009, are not intentionally used in the manufacture of or formulation of this product.

#### **United States**

Materials listed in the Clean Air Act Amendments of 1990 (Class I, CFC's and Class II, HCFC's, Halons and the solvents, carbon tetrachloride and 1,1,1-trichloroethane) are not intentionally used in the production of this product.

### **Penta- and Octa- BDE**

Please note that as of June 1, 2009 REACH Annex XVII replaces Directive 76/769/EEC – The “Limitation Directive” for Dangerous Substances and Preparations which places restrictions on the marketing and use of certain dangerous substances and preparations namely pentabromodiphenyl ether, and octabromodiphenyl ether.

Neither pentabromodiphenyl ether nor octabromodiphenyl ether are used in the formulation of this product and will not be found in concentrations higher than 0.1 % by mass in this product.

This product is manufactured by affiliates and subsidiaries of the LyondellBasell group of companies around the world.

Under the EC Regulation REACH this product is classified as a preparation. If the product has been purchased from any company of the LyondellBasell group of companies registered in the European Union, we confirm that all substances in this preparation have been registered under REACH, in accordance with the deadlines set forth in REACH (Regulation (EU) No. 1907/2006)

We remind you, if this product is purchased from any supplier, including other companies of the LyondellBasell group, which is not established in the European Union, the importer into the European Economic Area (EEA) is responsible for compliance with the requirements of REACH.

Please contact REACH@LYB.COM if you need to discuss the potential Only Representative functionality before importing this product into the EEA.

### **REACH Annex XVII**

REACH Annex XVII – Restriction on the Manufacture, Placing on the Market and Use of Certain Dangerous Substances, Preparations and Articles.

The chemical materials listed in REACH Annex XVII are not used in the manufacture or the formulation of this product. However, this product has not been tested for these chemical materials.

### **REACH Only Representative (OR) Services**

If this product is purchased from any supplier, including other companies of the LyondellBasell group, which is not established in the European Union, the importer into the European Economic Area (EEA) is responsible for compliance with the requirements of REACH.

Please contact REACH@LYB.COM if you need to discuss the potential Only Representative functionality before importing this product into the EEA.

### **REACH Substances of Very High Concern (SVHC)**

This product does not contain any of the Annex XIV substances on the Authorisation list or Annex XIV candidate chemicals proposed to be Substances of Very High Concern for Authorisation (List as of January 17, 2022) above the 0.1 % threshold as stated in REACH (Article 57, Regulation No. 1907/2006) determined either through (i) non-use of the substance, (ii) mass balance calculation, or (iii) specific testing. The current list of all SVHCs can be found at ECHA website link listed below:

<https://www.echa.europa.eu/candidate-list-table>

### **Global Toy Regulations**

CEN EN Standards refer to safety of toys and not specifically to plastic raw materials. According to the information provided by our raw material suppliers, we deem this product should comply with the requirements of CEN standards EN71-3 / EN71-9 (as amended) as applicable to plastic raw materials (pellets, powder, flakes). However, this product has not been tested according to these CEN Standards.

H.R. 4040 establishes consumer product safety standards and other safety requirements for children's products and reauthorizes and modernizes the Consumer Product Safety Commission. The product listed above is a commercial product, not a consumer product although some manufacturers may choose to use this material in consumer products. We have reviewed the act and believe that this material will not impair the ability of our customers to comply with the act, however it is the responsibility of our customers to insure compliance and provide any required testing.

We have reviewed Standard Consumer Safety Specification of Toy Safety: ASTM F-963-2017. It appears that Section 4.3.5 applies to paints or similar coatings, and accessible parts of toys, and section 8.3 describes corresponding testing protocol. Metal elements mentioned in Section 4.3.5 are not intentionally used in the production or formulation of this product.

## **USDA**

It is our understanding that it is not necessary to obtain a letter of chemical acceptance from USDA prior to using a packaging material for meat or poultry products provided that the packer has on file a letter from the materials supplier assuring that its products are in compliance with the Federal Food, Drug and Cosmetic Act.

## **Disclaimer**

Information in this document is accurate to the best of our knowledge at the date of publication. The document is designed to provide users general information for safe handling, use, processing, storage, transportation, disposal and release and does not constitute any warranty or quality specification, either express or implied, including any warranty of merchantability or fitness for any particular purpose. Users shall determine whether the product is suitable for their use and can be used safely and legally.

In addition to any prohibitions of use specifically noted in this document, LyondellBasell may further prohibit or restrict the sale of its products into certain applications. For further information, please contact a LyondellBasell representative.

## **Trademarks**

The Trademark referenced within the product name is owned or used by the LyondellBasell family of companies.