



## **Regulatory Affairs and Product Stewardship Information**

**2021: Version 2**

Polyvinyl Chloride Reon 67GER01

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

The product complies with the requirements of Regulation 1935/2004/EC applicable to intermediate materials. The product complies with the requirements of Regulation EU/10/2011 and its subsequent amendments applicable.

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**

Grade conforms to Positive list of constituents of polyvinyl chloride (PVC) and its copolymers in contact with foodstuffs, pharmaceuticals and drinking water as prescribed in IS-10148.

It also meets the requirements stated in IS-10151: "Specification for polyvinyl chloride (PVC) and its copolymers for its safe use in contact with foodstuffs, pharmaceuticals and drinking water"

### **SVHC Declaration**

ECHA has so far identified 211 chemical substances as the Substances of Very High Concern (SVHC), which are in the Candidate List of REACH Regulation (EC/1907/2006) (Updated January 2021). We confirm that these substances are not present in more than 0.1% weight / weight in this grade. As the list is subjected to be updated from time to time, we will also update you on the SVHC status of any such chemical, if included at later stage.

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

The products listed above 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. These grades do 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 (EMA/410/01, rev.3- July 2011).

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

The product conforms to amendments to 94/62/EC (Amendment number EU/2015/720, 2004/12/EC, 2005/20/EC, 219/2009). This product 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**

This product meets the requirements specified in EU directive 2011/65/EU, amended directive EU/2015/863, on the restriction of the 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 ( $\text{Cr}^{6+}$ ), and/or its compound and hence their traces are not present in above mentioned grade.

### **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 this regulations after shredding 80% of the material should be recyclable. Products made out of the grade are 100 % recyclable.

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

This product presents no significant risk for cancer to the people of California. This product 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.

### **Nanomaterials**

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

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

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

### **Polychlorinated 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.

### **Food Allergens**

The following list of allergens 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
- Fish or fish products, Shell fish and Crustaceans
- Mustard and products thereof and 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)
- Lupine or lupine products.

### **Halal and Koshar Compliance**

We hereby confirm that above grades does not contain any ingredient derived from animal 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 Kosher Complaint.

### **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 grades manufactured by RIL do not originate from / neither contain genetically modified organisms, in other words they are GMO-FREE.

## **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.

## **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 do 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, however we donot analyse these specific substances or compounds.

## **Persistent Organic Pollutants**

The grade does not contain POPs chemicals listed under Stockholm Convention (Annex A), Rotterdam Convention (Annex III) & EU POPs Regulation (EU) 2019/1021 (Annexure I, IV).

## **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) (CAS # 624-49-7)

Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) (CAS # 3380-34-5)

2-(2H-1,2,3-Benzotriazol-2-yl)-4,6-di-tert-butylphenol (CAS # 3846-71-1)

2-Mercaptobenzothiazole (MBT) (CAS # 149-30-4)

Polycyclic Aromatic Hydrocarbons (PAHs)

- |   |  |
|---|--|
| • 1,2-dihydro-acenaphthene (CAS # 83-32-9)                | • Benzo(k)fluoranthene (CAS 207-08-9)    |
| • Acenaphthylene (CAS 208-96-8)                           | • Chrysene (CAS 218-01-9)                |
| • 9H-fluorene (CAS 86-73-7) and anthracene (CAS 120-12-7) | • Dibenz(a,h)anthracene (CAS 53-70-3)    |
| • Benz(a)anthracene (CAS 56-55-3)                         | • Fluoranthene (CAS 206-44-0)            |
| • Benzo(a)pyrene (CAS 50-32-8)                            | • Fluorine (CAS 86-73-7)                 |
| • Benzo(b)fluoranthene (CAS 205-99-2)                     | • Indeno(1,2,3-cd) pyrene (CAS 193-39-5) |
| • Benzo(e)pyrene (CAS 192-97-2)                           | • Naphthalene (CAS 91-20-3)              |
| • Benzo(ghi)perylene (CAS 191-24-2)                       | • Phenanthrene (CAS 85-01-8)             |
| • Benzo(j)fluoranthene (CAS 205-82-3)                     | • Pyrene (CAS 129-00-0)                  |

Organo-tin Compounds:

- Tributyl-tin (TBT), di-butyl tin (DBT),
- monobutyl-tin (MBT) or any other organo-tin compound
- Acrylamide and Acrylonitrile
- Aniline

- Aromatic Amines
- Asbestos
- Atrazine
- Benzene
- Benzofuranes - Flame Retardants
- Benzophenone
- Bisphenol-A, B, F, S
- Chlorine, Bromine
- Chlorofluorocarbon (CFC)
- Dioxin
- Halogenated Flame Retardants
- ITX Photoinitiators
- Melamine
- Mercury
- Naphthalene
- N-Nitrosamines and N-Nitrosatables
- Tris(4-nonylphenyl, branched and linear) phosphite (TNPP), 4-Nonylphenol (4NP) and nonylphenol ethoxylates
- Paraben
- 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
- Silicone
- Silver
- Styrene and polystyrene
- Sulphur
- TAA adhesion promoters
- Natural rubber latex, natural rubber or synthetic Latex
- Pyridine
- Gamma Picoline
- Beta Picoline
- Morpholine
- Sodium Sulphide
- Potassium Carbonate
- Acetone
- Phosphorous Trichloride
- Phosphorous Pentachloride
- Phosphorous Oxychloride
- Hydrogen Peroxide
- Precipitated Barium Carbonate
- Sodium Formaldehyde Sulphoxylate
- Sodium Tripolyphosphate
- Sulphur dioxide and sulphites

**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.**

**This certificate is valid for two years, however as the above mentioned regulations have amendments regularly, our declarations will be updated accordingly. Hence, customers are requested to check for new declarations from time to time before usage. This declaration replaces all previous versions.**

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