

# G36-10-150 Polyethylene Copolymer

## Regulatory Position Statement

Regulatory Issues

January 2012

### US FDA Food Contact

This product is not suitable for use in food contact products.

### WEEE

European Directive 2002/96/EC covers waste from electrical and electronic equipment (WEEE). INEOS products are raw materials used in the manufacture of articles and components; therefore, this Directive is not directly applicable to our products. This product does not contain any substances classified as hazardous.

### RoHS

INEOS polymers are in compliance with European Directive 2002/95/EC (RoHS) as it relates to the restriction of the use of certain hazardous substances in electrical and electronic equipment.

### GLOBAL INVENTORY STATUS

<i>Country</i>	<i>Inventory</i>	<i>Y/N</i>
United States	TSCA	Y
European Union	Y	Y
China	IECS	Y
Canada	DSL	Y

<i>Country</i>	<i>Inventory</i>	<i>Y/N</i>
Japan	ENCS	Y
Korea	KECI	Y
Australia	AICS	Y
Philippines	PICCS	Y
New Zealand	NZIoC	Y

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### REACH

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#### REACH EC 1907/2006

INEOS Olefins & Polymers USA has completed the REACH pre-registration of all required chemicals. This was accomplished through agreements with our INEOS colleagues in the EU to act as our Only Representatives (OR). One OR pre-registered our monomers, the other OR pre-registered the necessary additives used in our polypropylene and/or polyethylene products. All required pre-registrations were submitted prior to the December 1, 2008 deadline. Please contact Julie Clifford at [julie.clifford@ineos.com](mailto:julie.clifford@ineos.com) if you need further information.

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

##### Current Candidate List Total: 73

None of the chemicals listed on the REACH SVHC list are intentionally added in the manufacturing process as components of this material.

#### Substances of Concern to Our Customers

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##### 3-MCPD (3-monochloropropane)

No 3-MCPD is intentionally added to the resin or used as additives or raw material in the manufacture of this product.

##### Alkylphenols and Ethoxylates

No alkylphenols, ethoxylates or estrogen-mimicking compounds are intentionally used in the manufacture of this product.

##### Allergens

No known allergens or allergen derivatives from such things as peanuts, lupine, soy/soybeans, carmine/cochineal, milk, eggs, fish, shellfish/crustacea, tree nuts, celery, sesame seeds, mustard, glutamates, glutamic acid, MSG or hydrolyzed vegetable proteins, nitrites or sulfites, or grains/cereals containing gluten substances have been intentionally added during the formulation, or used as a processing aide in the manufacture of this product.

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### **Animal Derived Material/BSE/TSE**

No animal fats, oils, milk products or other animal- or tallow-derived products are intentionally used as components of, or in the manufacture of, this product

### **Antimicrobial agents/Fungicides/Pesticides**

No antimicrobial agents, fungicides or pesticides are intentionally added or used as an additive or raw material in the manufacture of this product.

### **Asbestos**

No asbestos is intentionally added or used as an additive or raw material in the manufacture of this product.

### **Benzophenones**

No benzophenones are intentionally added to the resin or used as additives or raw material in the manufacture of this product.

### **Bisphenol A, BADGE, BFDGE, NOGE/ (EC) No. 1895/2005**

No bisphenol A (BPA), 2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether ('BADGE' i.e. Bisphenol-A DiGlycidyl Ether), bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ethers ('BFDGE' i.e. Bisphenol-F DiGlycidyl Ether) and novolac glycidyl ethers (NOGE) is intentionally added or used as an additive or raw material in the manufacture of this product.

### **Decabromodiphenyl ether (Deca)**

No decabromodiphenyl ether (Deca) is intentionally added or used as an additive or raw material in the manufacture of this product.

### **Dimethyl Fumarate (DMF)**

No dimethyl fumarate, CAS #624-49-7, is intentionally added or used as an additive or raw material in the manufacture of this product.

### **Dioxins**

No dioxin or dioxin isomers are intentionally added or used as an additive or raw material in the manufacture of this product.

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### Flame Retardants

No brominated flame retardants either PBBs or PBDEs, TBA or TBP, or hexabromo cyclododecane (HBCDD), or tris-aziridinyphosphin oxide, is intentionally added to the resin or used as additives or raw material in the manufacture of this product.

### Formaldehyde

No formaldehyde is intentionally added or used as an additive or raw material in the manufacture of this product.

### GMOs – Genetically Modified Organisms

No GMOs, genetic material from GMOs, materials derived from GMOs, nor any genetically modified ingredients have been intentionally used at any time in the manufacture of this product.

### HAPs (Hazardous Air Pollutants)

None of the HAPs listed by US EPA in 40 CFR 63.3360 (c)(3) are intentionally added to the product in the manufacturing process.

### Heavy Metals/CONEG/EU Directive 94/62/EC

No antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury or selenium is intentionally used in the formulation of this product. Previous testing for these metals resulted in a total incidental amount for all metals detected of < 5 ppm, compared to the CONEG requirement of < 100 ppm. The result for incidental lead concentrations was less than the detection limit of 10 ppb (0.01 ppm).

### Latex Content

No latex, latex compounds or natural rubber are intentionally added or used as an additive or raw material in the manufacture of this product.

### Melamine

No melamine is intentionally added or used as an additive or raw material in the manufacture of this product.

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### **Nanoparticles**

Nanoparticles are not intentionally added or used as additives or raw materials in the manufacture of this product.

### **N-Ethyl-toluenesulfonamide (Ortho/Para)**

No N-Ethyl-toluenesulfonamide is intentionally added or used as an additive or raw material in the manufacture of this product.

### **Organotin Compounds**

No organotin compounds are intentionally added or used as an additive or raw material in the manufacture of this product.

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

In compliance with EPA's US Clean Air Act, Title VI, no Class I nor Class II ODC is intentionally added or used as an additive or raw material in the manufacture of this product.

### **PAHs (Polycyclic Aromatic Hydrocarbons)**

None of the PAHs listed by US EPA are intentionally introduced in the process or is known to be produced in the process.

### **PCBs**

No polychlorinated biphenyl compounds (PCBs) are intentionally added or used as an additive or raw material in the manufacture of this product.

### **PFAAs: PFOs, PFAs and PFOA and EU Directive 2006/122/EC**

No perfluorooctanoic acid (PFOA), perfluoro-alkyl sulphonates (PFAS), or perfluorooctane sulfonates (PFOs) are added to the resin or used as additives or raw material in the manufacture of this product. Therefore, this product is compliant with EU directive 2006/122/EC.

### **Phthalates**

No phthalates (e.g., DEHP, DIDP, DINP, DMP, DIDP, BBP, DNOP, DBP, DEP) are intentionally added nor used as additives or raw materials in the manufacture of this product. No substance listed on

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California's Proposition 65 chemicals listing, known to the State of California to cause cancer or reproductive toxicity, is intentionally added in the manufacture of this product.

### **PVC**

No polyvinyl chloride (PVC) is intentionally added to the resin or used as additives or raw material in the manufacture of this product.

### **Short Chain Chlorinated paraffins (SCCPs)**

No short chain chlorinated paraffins are intentionally added to the resin or used as additives or raw material in the manufacture of this product.

### **TNPP**

No Tris(nonylphenyl) phosphite (TNPP) is intentionally added or used as additives or raw materials in the manufacture of this product.

### **Triclosan (2,4,4' –trichloro-2'-hydroxydiphenyl ether)**

No 2,4,4' –trichloro-2'-hydroxydiphenyl ether (Triclosan) is intentionally added or used as additive or raw material in the manufacture of this product.

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For further information, please see our website [www.ineos-op.com](http://www.ineos-op.com) or contact Product Stewardship.

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