

February 19, 2017

Shulong Dai
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Alathon M5370

A product of Equistar Chemicals, LP

Dear Shulong Dai:

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.

Product Stewardship Bulletin



Alathon M5370

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/dm² 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).

68320; Octadecyl 3(3,5-Di-tert-butyl-4-hydroxyphenyl) propionate; SML = 6 mg/kg

This product contains one or more Dual Use Additives as defined in Regulation 10/2011/EC.

- ▶ E 470a Calcium salts of fatty acids

United States

The base resin in this product meets the FDA requirements contained in the Code of Federal Regulations in 21 CFR 177.1520(a)(3)(i) and (c)3.2a.

This product may also 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, the substances used in this product meet the requirements of their respective FDA regulations and 21 CFR 177.1520(b).

This product meets the FDA criteria in 21 CFR 177.1520 for food contact applications, including cooking, listed under conditions of use A through H in 21 CFR 176.170(c), Table 2, and can be used in contact with all food types as listed in 21 CFR 176.170(c), Table 1.

China

All additives used in this product comply with the requirements of GB9685-2008 and Ministry Of Health Announcement 2012 No.5. However, this product contains one additive for which a Specific Migration Limit (SML) and/or Maximum Permitted Quantity (QM) in the final article has been established in GB9685-2008 or Ministry Of Health Announcement 2012 No.5. Please be reminded that these specifications apply to the final articles as defined in GB9685-2008, section 2.4 and 2.5.

Allergen Statements

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.

Food Allergens

The following list of allergens are not used in the manufacture of or formulation of this product. However, we do not test our products for these substances.

The list includes:

Peanuts, peanut oil, any peanut products;
Tree nuts (almonds, Brazil nuts, chestnuts, filberts, hazelnuts, hickory nuts, macadamia nuts, pecans, pine nuts, pistachios, and walnuts);
Refined or unrefined oils;
Milk (casein) or milk products, dairy products, dairy derivatives, lactose with protein;
Eggs or egg products;
Soybeans, soy flour, any soy products;
Fish (e.g. cod, salmon) or fish products;
Shellfish, crustaceans (e.g. shrimp, crabs, lobsters, oysters, clams, scallops, crayfish);
Molluscs (e.g. snails, clams, squid, octopi) or mollusc products;
Sulfites;
Food colors;
Carmine;
Cochineal;
Corn;
Celery or celery products;
Wheat (gluten) or wheat products;
Seeds (e.g. cotton, poppy, sesame, sunflower, mustard) or seed products;
Aspartame;
Monosodium glutamate (MSG);
Caffeine;
Hydrogenated vegetable protein (HVP);
Hydrolyzed protein;
Grains (e.g. rye, barley, oats);
Lecithin;
Lupine or lupine products;

Biomedical Policy

This product(s) may not be used in:

(i) any U.S. FDA Class I, Health Canada Class I, and/or European Union Class I Medical Devices, without prior notification to Seller for each specific product and application; or (ii) the manufacture of any of the following, without prior written approval by Seller for each specific product and application: (1) U.S. FDA Class II, Health Canada Class II or Class III, and/or European Union Class II Medical Devices; (2) film, overwrap and/or product packaging that is considered a part or component of one of the aforementioned Medical Devices; (3) 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; (4) tobacco related products and applications; (5) electronic cigarettes and similar devices.

(iii) Additionally, the product(s) may not be used in: (1) U.S. FDA Class III, Health Canada Class IV, and/or European Class III Medical Devices; (2) applications involving permanent implantation into the body; (3) life-sustaining medical applications.

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

Animal Based Raw-Materials (BSE/TSE)

United States

One or more additives in this product may be derived from animal sources. Our suppliers have stated that their additive is derived from bovine material. They have assured us that the animal material is sourced from the United States, Canada or Mexico. The bovine material can be any part of the animal. There were two sets of process conditions specified by our suppliers for processing the bovine material. These are: (1) Hydrogenation of tallow @200 deg. C, hydrolysis @260 deg. C, and 48 bar for 1.5-2 hours and vacuum distillation @232 deg. C; (2) Hydrolysis of tallow @260 deg. C and 700 psig for 3 hours, hydrogenation of stearic acid @232 deg. C and 300 psig for 2.5 hours, and distilled at 232 deg. C for 5 minutes.

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 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 - 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 - including carcinogen, mutagenic and reproductive toxins (CMR).

CONEG - Coalition of Northeastern Governors

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

Lead, mercury, cadmium and hexavalent chromium, as identified in the CONEG Model Legislation.

Genetically Modified Organisms (GMO)

Additives derived from Genetically Modified Organisms (GMO's) are not intentionally used in the formulation of this product.

Kosher Certification

We do not certify our resins to be Kosher or in compliance with Kosher requirements.

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 its following amendments concerning the defined limit(s) of heavy metals.

Other Chemicals

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

Acrolein; (propenal); (CAS# 107-02-8);

Asbestos;

Azo Dyes and Pigments;

Bisphenol A; (BPA); CAS# 80-05-7;

Formaldehyde; CAS# 50-00-0;

Halogenated Flame Retardants

Melamine; (1,3,5-Triazine-2,4,6-triamine); CAS# 108-78-1;

Organotin compounds;

Perfluorooctane sulfonate; (PFOS); CAS# 1763-23-1;

Perfluorooctanoic acid; (PFOA); CAS# 335-67-1;

Phthalates;

Styrene monomer; CAS# 100-42-5;

Vinyl chloride; CAS# 75-01-4;

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.

REACH Information

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 Basell Sales & Marketing Company B.V. BSM), we confirm that all substances in this preparation have been pre-registered or, where required under REACH, registered, and that we have the intention either to proceed with their registration in accordance with the deadlines set forth in REACH, or to procure substances only from suppliers from which confirmation has been received that the suppliers are aware of their REACH requirements, that they have met their pre-registration and applicable registration obligations of their substances, and that they will supply the relevant Safety Data Sheets (SDS) with REACH registration numbers as soon as the registrations occur. In no event shall any LyondellBasell group be liable for any non-compliance deriving from false or incorrect statements of its suppliers.

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.

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

REACH Substances of Very High Concern (SVHC)

This product does not contain any of the Annex XIV candidate chemicals proposed to be Substances of Very High Concern (List as of January 12, 2017) 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:

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-963-96. It appears that Section 4.3.5 applies to paints or similar coatings and section 8.3 describes testing protocol for these coatings. Our conclusion is that the standard is to be applied to paint or coatings on a finished toy (8.3.3), therefore the standard is not applicable to the resin supplied by the companies of LyondellBasell. Analyses of representative polyolefin resin samples have shown metal content to be less than 2 ppm.

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.

WEEE - European Union (EU) Directives 2011/65/EU

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

Lead, mercury, cadmium, hexavalent chromium, Polybrominated biphenyl (PBB) and Polybrominated diphenyl ethers (PBDE) as identified in 2011/65/EU: Commission Decision of 8 June 2011 repealing Directive 2002/95/EC and its successive amendments.

The RoHS Directive complements the WEEE Directive.

EU legislation restricting the use of hazardous substances in electrical and electronic equipment (Directive 2002/95/EC) and promoting the collection and recycling of such equipment (Directive 2002/96/EC).

Disclaimer

The information in this document is, to our knowledge, true and accurate at the time and date of issue. However, information in this document may be updated periodically due to changes in the laws and regulations, or for other reasons, therefore we cannot guarantee that the status of this product will remain unchanged. Users are expected to regularly visit the PSInfo Website to obtain the most current information on this product. Product Stewardship Bulletins not directly received from the PSInfo system are uncontrolled documents.

Before using a product sold by a company of the LyondellBasell family of companies, users should make their own independent determination that the product is suitable for the intended use and can be used safely and legally.

SELLER MAKES NO WARRANTY; EXPRESS OR IMPLIED (INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY WARRANTY) OTHER THAN AS SEPARATELY AGREED TO BY THE PARTIES IN A CONTRACT.

Users should review the applicable Safety Data Sheet before handling the product.

This product(s) may not be used in the manufacture of any of the following, without prior written approval by Seller for each specific product and application:

- (i) U.S. FDA Class I or II Medical Devices; Health Canada Class I, II or III Medical Devices; European Union Class I or II Medical Devices;
- (ii) film, overwrap and/or product packaging that is considered a part or component of one of the aforementioned medical devices;
- (iii) 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; tobacco related products and applications, electronic cigarettes and similar devices.

The product(s) may not be used in:

- (i) U.S. FDA Class III Medical Devices; Health Canada Class IV Medical Devices; European Class III Medical Devices;
- (ii) applications involving permanent implantation into the body;
- (iii) life-sustaining medical applications.

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

In addition to the above, LyondellBasell may further prohibit or restrict the use of its products in certain applications. For further information, please contact a LyondellBasell representative.

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