



A division of Altium
Packaging LP

February 2020

RE: EcoPrime® Resin (EcoPrime®, EcoPrime® +, EcoPrime® C+, OceanBound EcoPrime®)

Dear Valued Customer:

We provide this letter in response to certification requests received from customers relating to the Product enumerated above. Analyses for specific chemicals are not routinely performed except as specifically noted below. To the best of our knowledge of our feedstocks and our process:

1. We believe that the raw materials used to produce our natural product resins do not typically contain lead, cadmium, mercury, or hexavalent chromium at or above regulated levels, nor do we intentionally introduce any such chemicals during manufacture of these product. We run limited scientific testing to measure for the presence of these chemicals. The results indicate that the sum of the concentration levels incidentally present do not exceed 100 parts per million by weight (0.01%) in compliance with the Coalition of Northeast Governors (CONEG) legislation.
2. We believe our Product meets 2008 Consumer Product Safety Improvement Act (CPSIA) requirements (16 C.F.R. Part 1303, Lead in Paint (<90 ppm lead), CPSIA Section 101, Lead Content in Substrates (<300 ppm lead), CPSIA Section 108, Phthalates (<1000 ppm DEHP, DBP, BBP, DINP, DIDP, DNOP)). Again, we run limited scientific testing to measure for the presence of these chemicals.
3. With respect to Polyaromatic Hydrocarbons (PAHs), limited scientific testing shows our product passes individual specifications with the sum of all listed PAHs present at < 0.2 mg/kg. Limited test results for arsenic are at < 1 mg/kg.
4. With respect to chemicals such as Benzophenone, Halogenated Polymers (which we understand to mean polymers containing fluorine, chlorine or bromine), Methyl-n-butyl ketone (MnBK), formaldehyde, nonylphenols or Vinyl Acetate, in an effort to remove these and other non-HDPE materials that could possibly be present in the post-consumer, curbside collection stream, we conduct a multi-stage production process that includes automated and manual sortation, hot washing, drying processes and extrusion processes. We do not intentionally introduce these chemicals to our Product.
5. The virgin plastic we recycle do not contain Bisphenol-A (BPA). BPA is not used to make HDPE. Limited testing for the presence of BPA as a contaminant in our product indicate that the concentration incidentally present is < 0.1mg/kg.
6. To our knowledge, our Product is compliant with and does not require safe harbor warnings under Proposition 65.
7. We do not expect melamine to be present in the Product, as our production processes are designed to eliminate chemicals of such high density and high melting point.
8. We do not intentionally introduce genetically modified and/or genetically engineered organisms or conflict minerals during the recycling process or distribution.

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9. At no point in the process do the following allergens come into contact with the Product: milk and milk products, peanuts and peanut products, wheat and wheat products, fish, crustaceans, soybean, soy byproducts and soybean-based products, egg and egg products, animal or animal byproducts, tartrazine and food colors, tree nuts, mustard, celery, sesame seeds, latex, sulfites, sulfates and sulfur, gluten, corn, rice, barley, oats or strains or grades thereof, cotton seeds, poppy seeds, sunflower seeds, lupine, oil, glycerin, or MSG.
10. With respect to the importation of articles into the European Union (EU) under the REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals, EC No. 1907/2006), we do not add any ingredients that are listed on the Candidate List as substances of very high concern (SVHC), the Authorization List in Annex XIV, the Restricted List under Annex XVII, or banned substances. The probability that the threshold of 0.1 mass % per SVHC would be exceeded in this Product is deemed low, taking into account the materials used and our manufacturing process which is designed to reduce unwanted contaminants. We have limited testing that measures for the presence of some SVHCs such as anthracene, benzo (k) fluoroanthene, benzo[ghi]perylene, BPA, cadmium, chrysene, fluoroanthene, lead, and pyrene which demonstrates that levels are below 0.1%.
11. We believe our Product complies with the EU Directive on the Restriction of Hazardous Substances in Electrical and Electronic Equipment known as RoHS 2 (Directive 2011/65/EU, 1 July 2011), which sets restrictions on the heavy metals lead, mercury, cadmium, and hexavalent chromium and polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) flame retardants.
12. The Product is classified as non-hazardous under the EU CLP (Classification, Labelling, and Packaging) regulation (EC 1272/2008).
13. We have not applied for authorization under the EU Recycled Plastics Directive. We have not determined the status of the Product under applicable EU Directives governing Food Packaging, Plastics Waste, or Good Manufacturing Practices.
14. Our U.S.A.-based company has engaged an Only Representative under REACH and has registered ethylene monomer to support the Product and customers in the EU.

The foregoing comments relate only to the Product specified hereunder and not to the finished products that incorporate our Product. If you have questions, please contact your sales representative. Thank you for your business.

Sincerely,



Khosrow Hallaji
Multi Plant Technical Director
Envision Plastics