



A division of Altium
Packaging LP

February 2020

RE: Polypropylene – PCR Food Grade

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 Product 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. With respect to chemicals such as polyaromatic hydrocarbons (PAHs), benzophenone, halogenated polymers (which we understand to mean polymers containing fluorine, chlorine or bromine), methyl-n-butyl ketone (MNBK), arsenic, 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.
3. Customers are advised that polypropylene resins on the market can be made using a phthalate-based catalyst system which leaves residual phthalates in the resin. This Product has not been tested for the presence of phthalates.
4. Bisphenol-A (BPA) is not used to manufacture virgin PP. BPA may be present at low levels as a contaminant in PP-PCR due to the recycling of direct print containers. Based on test results, its unintentionally presence in our product is well under the Food and Drug Administration's (FDA's) No Observable Adverse Effect Level (NOAEL) for BPA of 5 mg/kg bw/day.
5. To our knowledge, our Product is compliant with and does not require safe harbor warnings under Proposition 65.
6. 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.
7. We do not intentionally introduce genetically modified and/or genetically engineered organisms or conflict minerals during the recycling process or distribution.
8. 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

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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.

9. This Product is DRC conflict-free. Conflict minerals are defined by the US legislation as the metals tantalum, tin, tungsten and gold, which are the derivatives of the minerals cassiterite, columbite-tantalite and wolframite, respectively. The derivatives of these minerals are referred to as 3TG. The SEC rules define conflict minerals as 3TG metals, wherever extracted. In the SEC rule, "DRC conflict-free" is defined as minerals that were extracted and did not directly or indirectly benefit armed groups in the covered countries. Envision supplies recycled PP plastic resin sourced from North America. No 3TG metals are intentionally added in the manufacture of PP. The Envision recovery system is specifically designed to remove unwanted metal contaminants.
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. Envision does not test for SVHCs and is not aware of any SVHCs above 0.1% mass in the Product. 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 not engaged an Only Representative (OR) to support the REACH registration status of the Product.
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 or determined the status of the Product under applicable EU Directives governing Food Packaging, Good Manufacturing Practices, or Plastics Waste.

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