

April 12, 2017

Shulong Dai

Ponci trading co,ltd

Room 908, JiaZheng International Building, No.28, Moyu Road,  
Anting Town, Jiading District, Shanghai 201805,P.R.C



***Integrate NP507030***

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.

Best regards,

A handwritten signature in black ink that reads "Stacie A. Eakin". The signature is written in a cursive, flowing style.

Stacie Eakin

Sr. Product Steward

713-309-7905

stacie.eakin@lyondellbasell.com

**Product  
Stewardship  
Bulletin**



***Integrate* NP507030**

A product of Equistar Chemicals, LP

**Global Food Contact Status:**

**European Union**

This product is not compliant with the EU Regulation 10/2011/EC (PIM), regarding plastics intended for use in food contact packaging.

**United States**

This resin does not comply with FDA requirements for articles that may be used in food packaging applications.

**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.

**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.

### **California Prop 65**

Please refer to the SDS for communications regarding California Proposition 65.

### **Conflict Minerals (Dodd-Frank Wall Street Reform and Consumer Protection Act - September, 2010)**

Please see link below for the position of LyondellBasell concerning this Act:

<https://www.lyondellbasell.com/en/investors/corporate-governance/?id=52>

The link to this document is located in the right margin under the heading "Corporate Governance Documents" titled "Conflict Minerals Policy".

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

### **Kosher Certification**

The additives and ingredients used to manufacture this resin may be derived from animal sources. The authorities holding the strictest interpretation within the Kosher certification community maintain that use of an additive from an animal source, such as tallow, in the packaging material disqualifies the packaging material and, in turn, the food from Kosher certification. Other rabbinical authorities assert with equal firmness that such additives used in the packaging materials do not affect the Kosher status of foods if the materials are safe in the public health sense and do not affect the taste or odor.

### **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.

### **End of Life Vehicle**

To the best of our knowledge, based on the available documentation from raw materials suppliers, we deem that this product complies with the directive 2000/53/EC and its following amendments as concerns the defined limit(s) of heavy metals.

### **Restriction of Hazardous Substances in Electric and Electronic Equipment (RoHS)**

RoHS Regulation refers to electrical and electronic equipment and not specifically to plastic raw materials. However, based on the available documentation from raw materials suppliers, this product complies with the requirements of the Directives 2002/95/EC and 2011/65/EU, as amended, concerning the limits of cadmium, lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl)phthalate (DEHP), butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP).

### **GB/T 26572-2011 "Restricted Substances in Electronic and Electrical Products" - China RoHS**

The RoHS Regulation refers to electronic and electrical equipment and not specifically to plastic raw materials. However, based on the available documentation from raw materials suppliers, this product complies with the requirements of the GB/T 26572-2011 "Restricted Substances in Electronic and Electrical Products" concerning the limits of cadmium, lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE).

### **Ozone Depleting Substances**

#### **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.

Please contact REACH@LyondellBasell.com if you need to discuss the potential compliance with REACH before importing this product into the EEA.

## 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.

See Product's European SDS at <https://productsafety.lyondellbasell.com> for classification and labeling of chemicals which are legally binding within the EU - including carcinogen, mutagenic and reproductive toxins (CMR).

## REACH Only Representative (OR) Services

Companies of LyondellBasell in North America will evaluate enquiries for OR services.

Please forward your request for OR services to reach@lyondellbasell.com.

## REACH Registration Status

The substances contained in this product have been registered under REACH by relevant companies of LyondellBasell in the European Union (EU), which either manufacture this product in their plant(s), or import this product into the EU. In case of preparations, such companies have received from their suppliers confirmation that the substances in such preparations have been pre-registered and/or registered under REACH.

For the REACH registration numbers of our products, please consult the appropriate regional SDS at <https://productsafety.lyondellbasell.com>.

## **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:

<http://echa.europa.eu/web/guest/candidate-list-table>

## **Global Toy Regulations:**

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.

## **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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