



Product Declaration & Continuing Guarantee
Inteplast Group BOPP Films

Date Issued: September 13, 2018 (10 pages including cover letter)

Product Type: BOPP – all grades and gauges
CAS # 9003-07-0 (PP- polypropylene)

All Inteplast BOPP film products produced in Lolita TX, Morristown TN, Gray Court SC, and Lanoraie Quebec, are produced for the requested physical properties of our customers and formulated for those intended purposes.

These statements do not cover: any modification of our product by any addition of any other product to it; any prejudicial modification of our product resulting from a processing of the product; or an inadequate use and/or storage of our material or the finished articles by the end user.

Consequently, this letter certifies that the above film types are produced by Inteplast and comply with all regulation requirements identified in this Product Declaration.

Please let me know if you require additional information.

Yours truly,

Valerie Kaiser

Valerie Kaiser

Regulatory Specialist – BOPP Films

Signed for/on behalf of Inteplast Group



INDEX #	REGULATION
1	GMP
2	FDA
3	EU Compliance
4	REACH
5	EC Directives
6	Microwave Applications
7	CEPA
8	CFIA
9	2017 Inventory Update (Canada)
10	Animal Derived Materials and BSE
11	Prop 65
12	CONEG
13	Allergens
14	Melamine
15	Benzyl Phenol
16	Phthalates/Plasticizers
17	Bisphenol A, Bisphenol F, BADGE,BFDGE,NOGE
18	PFC's/Flame Retardants / Fluorotelomers
19	BHA, BHT, & TBHQ
20	RoHS Directive
21	Clean Air Act - Ozone Depleting Substances
22	Natural Rubber Latex/GMM/GMO
23	Chlorine
24	Kosher
25	Vinyl Acetate/ PVC
26	Fungicides, Preservatives, Fumigants
27	Lead Content
28	Conflict Materials
29	Recyclability
30	Recycled Content
31	Storage Conditions



<u>Index #</u>	<u>Regulation</u>	<u>Requirement</u>	<u>Compliance</u>
1	GMP	Inteplast hereby guarantees that all BOPP film products shipped shall be free of foreign material, infestation, moisture damage, and rodent contamination in accordance with FDA’s “Good Manufacturing Practices 21 CFR 110”.	YES
2	FDA Compliance	<p>Inteplast guarantees that all of our BOPP products (*except PW and YCL) which are hereafter shipped or delivered to, or on the order of the above listed purchaser, as of the date of such shipment of delivery and subject to the conditions of use or other restrictions if any, are not adulterated or misbranded within the meaning of the Federal Food, Drug, and Cosmetic Act, as amended.</p> <p>Inteplast BOPP products* comply with the following Food and Drug Administration Regulations</p> <p>21 CFR 177.1520 (c) (1.1) and (3.1): This regulation describes polypropylene and olefin copolymers that can be safely used in articles used for packaging or holding food at low temperatures and/or room temperatures.</p> <p>21 CFR 178.2010: This regulation lists antioxidants and/or stabilizers for polymers which may be safely used for the manufacture of articles which come into direct contact with food.</p> <p>21 CFR 178.3130: This regulation lists antistatic and/or antifogging agents, which may be safely used for the manufacture of articles, which come into direct contact with food.</p> <p>21 CFR 176.170: This regulation has two tables for Raw and Processed Foods and Condition of use for Food Contact Substances. Providing that the metal surface of the metallized films are used as the inner sealable web in regular adhesive and/or poly-extrusion laminated structures for snacks, chocolate, confectionery and other food products where barrier requirements are critical would meet this regulation.</p> <p>*excluding PW and YCL which are label films and not intended for food contact applications</p>	YES



<p>3</p>	<p>European Union Compliance</p>	<p>European Union Directives:</p> <p>82/711/CEE - 93/8/CEE - 1935/2004/CE - 1895/2005/CE - 2002/72/CE ANNEXES I, II AND III and modifications included in 2004/19/CE - 2005/79/CE - 2007/19/CE -2008/39/EC 2023/2006 EC - 1935/2004EC - 94/62/EC - 85/572/EEC - 97/48EC,</p> <p>Germany: BGVV Recommendation VII - D.M. 21/3/73 and updating of 28/3/03 - D.M. 26/4/93 n° 220 - D.M. 15/6/00 n° 210</p>	<p>YES</p>
<p>4</p>	<p>REACH (EU # 1907/2006)</p>	<p>We certify that there are no substances contained in any of Inteplast’s BOPP products that are listed on the REACH regulations SVHC List as per the date of this letter, including the substances added on June 27, 2018. Inteplast is compliant with the June 1, 2011 deadline criteria. Which states per below: Businesses who make or sell goods in Europe have a legal obligation to notify ECHA by June 1, 2011 if:</p> <ol style="list-style-type: none"> 1. any Substance of Very High Concern that is on the Candidate List is present in their articles 2. such SVHC is above the threshold of 0.1% weight by weight and 3. the quantity of such substance in those articles is over 1 ton per producer/importer per year <p>We further certify that all substances contained in our BOPP products have EC and CAS numbers associated with them.</p> <p>This certificate relates only to non-printed/non-coated polypropylene films and includes all raw materials and processing aids used in our BOPP films.</p>	<p>YES</p>
<p>5</p>	<p>European Commission Directives</p>	<p>Inteplast here with certifies that all polypropylene non-printed/non-coated BOPP films, meet the requirements set forth in Directive 889/109/EC (1989), 90/128/EC (1990), 92/39/EC (1992), 93/9/EC (1993), 95/30EC (1995), 96/11/EC (1996), 1999/91/EC , EU 10/2011, EU RoHS(2002/95/EC), and ED2009/251/EC</p>	<p>YES</p>



6	Migratory Microwave Application	<p>The U.S. Food and Drug Administration (FDA) has not issued any specific regulations on food packaging for microwave use. However, any package used in a food contact applications must be suitable for the intended use under FDA's good manufacturing practices (GMP) regulation found in Title 21 of the Code of Federal Regulations (CFR), Section 174.5 ("General provisions applicable to indirect food additives"). The context of cooking/reheat and temperature of extraction with different food stimulants is covered by CFR 176.170 and usage of polypropylene film is covered by CFR 177.1520. Inteplast material complies with FDA 21 CFR 177.1520(c) (1.1) (c) 3.1a & (c) 3.2a including food cooking applications under conditions of use B, C, D, E and H described in Table 2 of 21 CFR 176.170 (c) and can be used with all food types listed in Table 1 of 21 CFR 176.170.</p> <p>If the film is in contact with fatty based foods it is possible to have superheating giving temperatures that can be above the melting point of the polypropylene film and non-compliance through breakdown (see 174.5).</p>	YES – below temperatures of 212 deg F
7	CEPA List of Challenge Substances Batch Numbers 1,2,3,4,5, 6,7,8, 9, 10, 11 and 12	<p>Inteplast does not analyze for substances not purposely added but we have reviewed the status of Inteplast BOPP film products in relation to the chemicals identified in the Canadian CEPA List. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in Inteplast BOPP film products.</p> <p>Please be advised that Inteplast does not use the ingredients identified on any of the current CEPA Lists Batch Numbers 1-12, in the formulation or in the process to manufacture Inteplast BOPP products. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.</p>	YES
8	CFIA	Inteplast BOPP direct food contact packaging films comply with all requirements from Health Canada, specifically, Part B Division 23 of the Canadian Food and Drugs Regulations	YES
9	2017 Inventory Update issued by Government of Canada	<p>Inteplast BOPP films (all types and gauges) do not contain any of the approximately 1500 substances included on the 2017 Inventory Update, issued by the Government of Canada, in quantities greater than 0.1% by concentration. List of Reportable Substances can be found using below web link: http://www.ec.gc.ca/ese-ees/default.asp?lang=En&n=71EF4032-1</p>	YES



<p>10</p>	<p>Animal Derived Materials and BSE</p>	<p>9 CFR 94.18: This regulation describes restrictions on importation of Meat and Edible Products from ruminants due to Bovine Spongiform Encephalopathy. Based on information from our resin suppliers, Glycerol Monostearate and Calcium Stearate are used to manufacture some resin grades and these are known to contain substances derived from animals. However, these resin grades meet both the EU and US FDA standards for being free from contamination with Transmissible Spongiform Encephalopathy (TSE) agents.</p>	<p>YES</p>
<p>11</p>	<p>PROP 65 Chemicals</p>	<p>Based on certification from our resin and additive suppliers, Inteplast Group BOPP certifies that all of our biaxially oriented polypropylene (BOPP) films do not contain any substance listed pursuant to the California Safe Drinking Water and Toxic Enforcement Act of 1986 (also known as Proposition 65) restrictions on “known carcinogens and reproductive toxicants.”</p> <p>Inteplast Group BOPP Films will update its certification necessitated by Proposition 65 list revisions that are promulgated by the California Environmental Protection Agency (CALEPA), Office of Environmental Health Hazard Assessment (OEHHA).</p> <p>This certificate includes all chemicals as of the Chemical List effective May 25, 2018 and relates only to non-printed/non-coated BOPP films as originally manufactured.</p>	<p>YES</p>
<p>12</p>	<p>CONEG (Heavy Metals)</p>	<p>Inteplast hereby certifies that its BOPP plants comply in all respects to the package requirements for heavy metals of the CONEG Model legislation; namely, that the sum of the concentration levels of lead, cadmium, mercury, and hexavalent chromium present in the component packaging materials shall not exceed the following:</p> <p style="text-align: center;"><u>100 parts per million (ppm)</u>, by weight</p> <p>The above mentioned four (4) heavy metals plus chloride, antimony, arsenic, barium, selenium, and silver shall not be intentionally added through the use of any chemical or additive used in the manufacturing of our products</p>	<p>YES</p>



13	ALLERGENS	<p>Inteplast BOPP film products do not contain the below mentioned components nor are they based or derived from any known or potential food allergen such as, but not limited to:</p> <ul style="list-style-type: none"> ➤ Peanuts ➤ Tree nuts ➤ Sesame/poppy/caraway seeds ➤ Eggs or egg derivatives ➤ Dairy or dairy derivatives ➤ Corn or corn derivatives ➤ Cottonseed products ➤ Soy or soy derivatives ➤ Gluten from rye, oats, wheat and barley ➤ FD&C/synthetic colors ➤ Sulfites ➤ Shellfish/fish ➤ Crustacean ➤ Monosodium glutamate ➤ Celery ➤ Aspartame 	YES
14	Melamine content	<p>Melamine is combined with formaldehyde to produce melamine resin, a very durable thermosetting plastic used in Formica™, and melamine foam, a polymeric cleaning product. The end products include countertops, dry erase boards, fabrics, glues, housewares, dinnerware, cooking spoons, guitar saddles, guitar nuts, acoustic foam paneling, and flame retardants. Melamine is one of the major components in Pigment Yellow 150, a colorant in inks and plastics.</p>	Inteplast BOPP materials do not contain Melamine
15	Benzyl Phenol	<p>(<i>organic chemistry</i>) C₆H₅CH₂C₆H₄OH A crystalline substance with a melting point of 20.2-20.9°C, or a liquid; used as a germicide, preservative, and antiseptic.</p>	Inteplast BOPP materials do not contain Benzyl Phenol
16	Phthalate Content Nonylphenol ethoxylates (NPEOs) Octylphenol ethoxylates (OPEOs) Alkylphenol ethoxylate BBP	<p>The phthalates listed in article 1 of Decision 1999/815/EC are not intentionally added in the manufacture of or the formulation of this product. The phthalates are di-iso-nonyl phthalate (DINP), di-(2-ethylhexyl)phthalate (DEHP), di-n-butyl phthalate (DBP), di-iso-decyl phthalate (DIDP), di-n-octyl phthalate(DNOP) and butylbenzyl phthalate(BBP). Phthalates are used primarily as plasticizers to add flexibility to plastics. The potential exposure to Di-n-Hexyl Phthalate (DnHP) has been known to cause adverse reproductive or developmental effects in people. Nonylphenol ethoxylates (NPEOs) and octylphenol ethoxylates (OPEOs) are also not used in the manufacture of Inteplast films.</p>	Inteplast BOPP materials do not contain Phthalates, NPEO's, OPEO's, or BBP




<p>17</p>	<p>Bisphenol A (BPA)</p> <p>Bisphenol A Diglycidyl Ether (BADGE)</p> <p>Bisphenol F Diglycidyl Ether (BFDGE)</p> <p>Novolac Glycidyl Ethers (NOGE)</p>	<p>Inteplast certifies that none of our BOPP films contain Bisphenol A, Bisphenol F, Bisphenol A Diglycidyl Ether (BADGE), Bisphenol F Diglycidyl Ether (BFDGE) and Novolac Glycidyl Ethers (NOGE). These are industrial chemical used to make polycarbonate plastic resins, epoxy resins, and other products.</p>	<p>Inteplast BOPP materials do not contain BPA, BADGE, BFDGE, NOGE substances</p>
<p>18</p>	<p>Flame Retardants</p> <p>PFC's</p> <p>Fluorotelomers</p>	<p>Inteplast certifies that none of our BOPP films contain any perfluorinated chemicals (PFCs), fluorotelomers, or brominated flame retardants, including but not limited to the following chemicals: Perfluorobutanoic Acid (PFBA) Cas # 375-22-4 Perfluorooctane Sulfonate Acid (PFOS) Cas # 1763-23-1 Perfluorooctanoic Acid (PFOA) Cas # 335-67-1 Polybrominated biphenyls (PBBs) Polybrominated Diphenyl Ethers (PBDE) Cas # 60371-14-4</p>	<p>Inteplast BOPP materials do not contain PFC's</p>
<p>19</p>	<p>BHT, BHA, and TBHQ</p>	<p>Butylated Hydroxytoluene (BHT), Butylated Hydroxyanisole (BHA), and Tertiary Butylhydroquinone (TBHQ), are not used in the formulation or manufacture of Inteplast BOPP films.</p>	<p>Inteplast BOPP films do not contain BHT, BHA, &TBHQ</p>
<p>20</p>	<p>RoHS Directive / EU RoHS 2 (Directive 2011/65/EU)</p>	<p>Inteplast hereby certifies that its BOPP plants comply in all respects to the package requirements related to the RoHS Directive 2002/95/EC, 2000/53/EC, 2003/11EC, and 2011/65/EU which replaced 2002/95/EC. Namely, that the sum of the concentration levels of lead, mercury, hexavalent chromium (CR6+), Polybrominated Biphenyls (PBB) and Polybrominated Diphenyl Ethers (PBDE), not exceed 1000 PPM or 0.1%. And that the concentration level of Cadmium not exceed 100 PPM or .01%. Inteplast BOPP Films also do not contain DEHP, BBP, DBP, DIBP substances added in 2015.</p> <p>The above mentioned substances shall not be intentionally added through the use of any chemical or additive used in the manufacturing of our products.</p>	<p>YES</p>



21	Ozone Depletion Substance	<p>Inteplast hereby certifies that its BOPP plants do not intentionally use any of the ozone depleting substances listed under Class I and Class II of the 1990 Clean Air Act to manufacture any of our polyolefin films. The films, therefore, do not require labeling as set out in the rule of the Federal Register (57 FR 19166) of the 4th of May 1992.</p> <p>This certificate relates only to non-printed/non-coated polypropylene packaging films.</p>	YES
22	Natural Rubber Latex GMM, GMO	<p>No Genetically Modified materials or Natural Rubber Latex are found in AmTopp BOPP films.</p>	<p>Inteplast BOPP materials do not contain GMM, GMO or Natural Rubber Latex</p>
23	Chlorine Bleach	<p>Use of Chlorine bleach in clean-up process or in product zones is not allowed</p>	<p>Inteplast BOPP films do not contain Chlorine</p>
24	Kosher Certified	<p>Inteplast is a plastic film manufacturing facility that has no type of foods or food type materials within the process or operation. To be Certified by a Rabbi of the Jewish Faith is not considered applicable for this type of facility.</p>	NO
25	Vinyl Acetate or PVC	<p>No Vinyl Acetate or PVC is contained in the products produced by Inteplast BOPP.</p>	<p>Inteplast BOPP materials do not contain PVC</p>
26	Antimicrobial Additives – Fungicides, Preservatives, and Fumigants	<p>Microbes that contaminate packaging materials typically are controlled by using heat, steam, or radiation, or by the addition of antimicrobial additives. Packaging microbials are materials that can be added to packaging materials and will prevent microbial growth.</p> <p>Inteplast does not utilize antimicrobial additives, nor use or treat BOPP films with fungicides, preservatives, or fumigants</p>	<p>Inteplast BOPP does not use Antimicrobial Additives, Fungicides, Preservatives or Fumigants</p>



27	Lead Content (lead in surface Coatings and or in Substrates Materials)	Virtually no lead is contained in the products produced by Inteplast BOPP. When tested by an outside laboratory, the lead content came back at < 0.041 ppm.	YES
28	Conflict Materials	Inteplast BOPP films do not contain any conflict materials (tin, tungsten, tantalum, and gold) originated in the DRC (Democratic Republic of the Congo) or adjoining countries. These metals are not any component of our films.	YES
29	Recyclability	<p>BOPP film products are recyclable as per Industry standards and procedures.</p>  <p>Recyclable film by original manufacturing. Some limitations may exist from conversion and or laminations depending on conversion type that shall be stated by converter. Recycling of BOPP films would be governed by the local availability of suitable recycling programs for polypropylene (SPI resin identification code “5”).</p>	YES
30	Recycled Content	Inteplast’s BOPP film may contain up to a maximum of 30% reclaim/internal scrap in the core layer of the film. We do not put any post consumer recycled material in our films.	
31	Storage Conditions	<p>Inteplast recommends for the storage of our BOPP films warehouse temperatures greater than 32 deg-F to avoid condensation when brought into plant, and less than 120 deg-F to avoid premature blooming of possible migratory additives. Humidity should be kept below 80% and film should be kept out of direct sunlight.</p> <p>We also suggest bringing the film into conditioned press space 24 hours before using.</p> <p>Inventory should be rotated FIFO to use within 12 months; for best results, use within 6 months.</p>	