2081 FM 102 Rd. Wharton, TX 77488 281/727-7300 281/727-7389 (fax)

Date August 5, 2021

## **Letter of Compliance**

Product Name: rigid PVC & PET films

# RoHS Directive 2011/65/EU (Commission Delegated Directive (EU) 2015/863) - Restriction on the use of certain Hazardous Substances (RoHS3):

Based on the information from our raw material suppliers and the best of our knowledge of manufacturing process, our products do not contain any;

	<b>3</b> 2
Restricted Substance	<b>Maximum Threshold Limit</b>
Cadmium and its compounds	100 ppm (0.01 weight %)
Mercury and its compounds	1000 ppm (0.1 weight %)
Hexavalent chromium and its	1000 ppm (0.1 weight %)
compounds	
Lead and its compounds *	1000 ppm (0.1 weight %)
Polybrominated biphenyls (PBB)	1000 ppm (0.1 weight %)
Polybrominated diphenyl ethers	1000 ppm (0.1 weight %)
(PBDE)	
Bis(2-Ethylhexyl) phthalate (DEHP)	1000 ppm (0.1 weight %)
Benzyl butyl phthalate (BBP)	1000 ppm (0.1 weight %)
Dibutyl phthalate (DBP)	1000 ppm (0.1 weight %)
Diisobutyl phthalate (DIBP)	1000 ppm (0.1 weight %)

#### **EU REACH 219- SVHC:**

Our products do not contain Substances of Very High Concern

(SVHC) as identified under Article 33 of Regulation (EC) No 1907/2006 (REACH) including the July 8,2021 additions by ECHA. To view the SVHC Candidate List, please visit:

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

#### **Phthalates:**

Based on the information from raw material supplier and the best of our knowledge of manufacturing process, none of any phthalates present in our products.

Material Name	CAS Number
Dibutyl phthalate (DBP)	84-74-2
Di-isobutyl phthalate (DIBP)	84-69-5
Butyl benzyl phthalate (BPP)	85-68-7
Dioctyl phthalate (DOP)[a.k.a. diethylhexyl phthalate (DEHP)]	117-81-7
Di (n-octyl) phthalate (DnOP)	117-84-0
Di-methoxyethyl phthalate (DMEP)	117-82-8
Di-n-pentyl phthalate (DNPP)	131-18-0
Di-isodecyl phthalate (DIDP)	26761-40-0
Di-isopentyl phthalate (DIPP)	605-50-5
Dihexyl phthalate (DHP)	84-75-3
Butyl benzyl phthalate (BBP)	85-68-7

2081 FM 102 Rd. Wharton, TX 77488 DI-Isononyl Phthalate (DINP) 281/727-7300 281/727-7389 (fax) 28553-12-0

## **California Proposition 65:**

Our products are compliance with Proposition 65, No Significant Risk Levels (NSRLs) for Carcinogens and Maximum Allowable Dose Levels (MADLs) for Chemicals Causing Reproductive Toxicity. There is no risk of harm from the use of our products, and our products are well within the safe harbor levels set by Proposition 65.

## **Ozone Depleting Substances:**

Our products do not contain any halon compounds listed in class I & II Ozone Depleting Substances of United State Environmental Protection Agency

#### **BPA/BPS:**

Based on the information from raw material supplier and the best of our knowledge of manufacturing process, our products do not contain BPA Bisphenol A or BPS Bisphenol S.

## **Consumer Product Safety Improvement Act (CPSIA):**

Our products do not contain lead and any phthalates (DEHP, DBP, BBP, DINP, DIDP, and DnOP) in formulation.

## Washington State CSPA (Children's Safe Product Act):

Our products meet the requirement and there is no any chemical listed in Chemicals of High Concern to Children (CHCC) at concentration above practical quantitation level (PQL) or 100 ppm.

#### **FDA Allergens:**

Our products do not contain allergens listed in the Food Allergen Labeling & Consumer Products Act of 2004 (milk, eggs, fish, Crustacean shellfish, tree nuts, peanuts, wheat, gluten, celery, seeds, mustard, and soybeans).

#### **Restricted Material List (RML)**

Based on the information from raw material supplier and the best of our knowledge of manufacturing process, our products do not contain any material list in the RML.

#### **Animal Origin:**

Nan Ya Plastics Corp. USA does not use any raw material derived from animal tissue, cells or body fluid. Our products do not contain animal fat derivatives such as Transmissible Spongiform Encephalopathy (TSE) or Bovine Spongiform Encephalopathy (BSE).

## **Model Toxics in Packaging Legislation – 1998 revision (CONEG):**

The CONEG model legislation sets forth concentration levels for lead, cadmium, mercury and hexavalent chromium. The sum of the concentration levels must not exceed 100 ppm. The sum of the concentration levels of these metals in Nan Ya's products are below 100 ppm. Based on the information from raw material suppliers and the best of our knowledge of manufacturing process, none of any heavy metal listed above present in our products.

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## Toxic Substances Control Act Section 6(h) and 40 CFR 751

Based on the information from raw material supplier and the best of our knowledge of manufacturing process, our products do not contain

- Phenol, isopropylated phosphate (3:1) (PIP (3:1))
- Decabromodiphenyl ether (DecaBDE)
- 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP)
- Hexachlorobutadiene (HCBD)
- Pentachlorothiophenol (PCTP)

Note: Nan Ya Plastics Corp. USA does not routinely analyze our products or the raw materials for the presence of these substances. However, based upon knowledge of the manufacturing process, the raw materials utilized, and compliance letter from our suppliers, the substances listed in these regulations are not expected to be present in our products.

Sincerely,

M1chael Wall
Nan Ya Plastics Corp. USA