Version: 26 May 2025

FOOD CONTACT DECLARATION

It is the responsibility of our customers to check if the materials supplied by SABIC and articles made out of it are suitable for the intended use and comply with all applicable regulations and requirements.

As a manufacturer of **plastic intermediate materials**, SABIC confirms that **SABIC® HDPE M80064S - 00900** has been formulated and manufactured in accordance with the relevant requirements of the following food contact recommendations or regulations:

Europe

Netherlands

Regeling van de Minister van Volksgezondheid, Welzijn van 14 maart 2014, kenmerk 328583-117560-VGP, houdende vaststelling van de Warenwetregeling verpakkingen en gebruiksartikelen die in contact komen met levensmiddelen (Warenwetregeling verpakkingen en gebruiksartikelen), and amendments. Chapter I – Kunststoffen.

Germany

Empfehlung III "Polyethylen" of Kunststoffe im Lebensmittelverkehr: Empfehlungen des Bundesinstituts für Risikobewertung (BfR) (former BgVV).

Status: April 1, 2021.

Bedarfsgegenständeverordnung in der Fassung der Bekanntmachung vom 23. Dezember 1997 (BGBl. 1998 I S. 5), latest amendment of April 3, 2024 (BGBl. 2024 I Nr. 114).

European Union (EU)

Regulation (EC) No 1935/2004 of the European Parliament and of the Council for the following aspects:

- **Traceability**

  Systems are in place that identify suppliers and customers one step forward / one step back in the value chain.

- **Declaration of Compliance / Supporting Documentation**

  This material will be accompanied by a written declaration, stating it complies with the relevant applicable food contact rules. Appropriate supporting documentation is available for competent authorities on their demand to demonstrate such compliance. This documentation will be renewed in case of substantial changes.

- **Good Manufacturing Practice (GMP)**

  This material has been manufactured in accordance with the relevant requirements of Commission Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

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- **Specific Measures**

  All components that comprise **SABIC® HDPE M80064S - 00900** are either listed or exempted from listing according to Commission Regulation (EU) No 10/2011, regulating plastic materials and articles intended to come into contact with food, up to and including **Commission Regulation (EU) No 2025/351.**

In accordance with the requirement described in Annex IV of Commission Regulation (EU) No 10/2011 to disclose adequate information about substances that are subject to restrictions and/or specifications set out in Annexes I and II to the aforementioned Regulation, we refer to the information given in the annex to this document.

Overall Migration Limit (OML) testing

To determine the OML, migration experiments have been carried out using test plaques as test specimen (1.6 mm, S/V ratio 6 dm²/kg) made of **SABIC® HDPE M80064S - 00900** or a comparable grade, in food simulants B, C and D2 (according to Table 1 of Annex III of Commission Regulation (EU) No 10/2011) under testing conditions covering long term storage above 6 months at room temperature and below, including heating up to 70ºC for up to 2 hours, or heating up to 100ºC for up to 15 minutes (OM2 in Table 3, Annex V of Commission Regulation (EU) No 10/2011).

Specific Migration Limit (SML) testing

For substances regulated with a SML and listed in Attachment “Substances subject to restrictions or specifications”, SML migration estimates following a worst-case calculation, assuming 100% migration, or migration modelling using an EU-recognized mathematic migration model, or migration experiments during 10 days at 60°C, using test plaques as test specimen (1.6 mm, SV ratio 6 dm²/kg) made of **SABIC® HDPE M80064S - 00900** or a comparable grade, in food simulants B, C and D2 (according to Table 1 of Annex III of Commission Regulation (EU) No 10/2011) have been carried out.

Test summary

Results have shown that under mentioned conditions migration limits (overall and if applicable specific) were not exceeded.

Compliance work to be performed by the downstream operator

In accordance with the guiding principles to avoid duplication of compliance work and to conduct compliance work as early as possible in the supply chain, SABIC has conducted hazard assessments in accordance with Article 19 of Commission Regulation (EU) No 10/2011, on standard test specimens under standardized testing conditions. Due to its role in the supply chain as a plastics intermediate materials manufacturer, SABIC can confirm compliance to Article 3(1)a of Regulation (EC) 1935/2004, and amendments. SABIC cannot assess exposure under every actual or foreseeable condition of use of the finished plastic material or article, wholly or partly composed of **SABIC® HDPE M80064S - 00900**. As a result, compliance to Articles 3(1)b and 3(1)c will have to be demonstrated by the producer of the final plastic material or article before placing it on the EU market.

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However, in order to support our customers to conclude on their own compliance work required by Article 3(1)(a) of Regulation (EC) No 1935/2004, upon specific request, based on customer's exposure assessment, SABIC may provide hazard information relevant for **SABIC® HDPE M80064S - 00900**.

Compliance to Commission Regulation (EU) 2024/3190

As of 19 December 2024, Commission Regulation (EU) 2024/3190 (amending Commission Regulation (EU) No 10/2011 and repealing Regulation (EU) 2018/213) prohibits the intentional use of Bisphenol A (BPA) (and other bisphenols and bisphenol derivatives with harmonised classification for specific hazardous properties) in plastic materials and articles intended to come into contact with food, as well as the placing on the EU market of food contact articles produced from those plastics.

Both single-use and repeat-use final food contact materials and articles manufactured using BPA (and other bisphenols and bisphenol derivatives) and complying with the rules as applicable before the date of entry into force of this Regulation, which do not comply with the rules in this Regulation, may be placed on the market until 20 July 2026.

SABIC® HDPE M80064S - 00900 complies with the relevant requirements of this specific measure. It should clearly be pointed out that in the manufacturing process of **SABIC® HDPE M80064S - 00900**, the following substances as such are not intentionally used or added:

- Bisphenol A (BPA) and other bisphenols and bisphenol derivatives

The requirements of Commission Regulation (EU) 2024/3190 apply to food contact materials and articles **that are manufactured using BPA** (as well as other bisphenols and bisphenol derivatives). Because **SABIC® HDPE M80064S - 00900**, as an 'intermediate food contact material' to be used to manufacture final food contact articles, is **not** manufactured using BPA (as well as other bisphenols and bisphenol derivatives), SABIC does not have any obligations under the specific measure regarding authorization, reporting and verification of compliance for **SABIC® HDPE M80064S - 00900** towards competent authorities or downstream users.

Non EU countries

Switzerland

Swiss ordinance on materials and objects in contact with food: SR 817.023.21 „Verordnung des EDI über Materialien und Gegenstände, die dazu bestimmt sind, mit Lebensmitteln in Berührung zu kommen (Bedarfsgegenständeverordnung) vom 16. Dezember 2016, 5. Abschnitt: Bedarfsgegenstände aus Kunststoff"; amended by AS 2024 755 of November 13, 2024 that entered into force on January 1, 2025.

United Kingdom

UK Statutory Instruments, 2019 No. 704: "*The Materials and Articles in Contact with Food (Amendment) (EU Exit) Regulations 2019*".

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The statutory instrument provides the necessary safety requirements to ensure businesses are producing safe food contact materials and articles for the UK's end users.
The policy objective of the statutory instrument is to maintain existing EU laws in the UK and fix the inoperabilities in retained direct EU legislation related to materials and articles in contact with food. It includes the following directly relevant EU regulations:

- Regulation (EC) No. 1935/2004: ("the Framework Regulation") on materials and articles intended to come into contact with food.
- Regulation (EU) No. 10/2011: on plastic materials and articles intended to come into contact with food.
- Regulation (EC) No. 2023/2006: on Good Manufacturing Practice for materials and articles intended to come into contact with food.
- Regulation (EC) No. 1895/2005: on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food.
- Regulation (EU) No. 2018/213: on the use of bisphenol A in varnishes and coatings intended to come into contact with food.

UK Statutory Instrument, 2019 No. 704 ensures that the retained EU law in UK domestic regulations continue to be operable after UK's exit (a.k.a. BREXIT) from the European Union.

Americas

United States of America (USA)

The resin comprising **SABIC® HDPE M80064S - 00900** is listed in the Code of Federal Regulations (CFR), Title 21, §177.1520 (olefin polymers), issued by the Food and Drug Administration (FDA).

All adjuvants are cleared according to the CFR, Title 21, part 178 (Indirect food additives), are generally recognised as safe (GRAS), are prior-sanctioned food ingredients, are cleared on basis of regulations for food additives of before 1958 or are cleared via a Food Contact Notification (FCN).

This material may be used under **conditions of use B – H** as described in Table 2 of the CFR, Title 21, §176.170(c) in contact with **all types of food** as described in Table 1 of the CFR, Title 21, §176.170(c).

It is the responsibility of the finished article manufacturer to determine suitability of final materials or articles, partly or fully composed of **SABIC® HDPE M80064S - 00900**, taking the material's physical and chemical properties into account, for safe use in contact with various food types under the intended conditions of use of the final material or article to ensure conformity with applicable US regulations or notifications.

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MERCOSUR (Argentina, Paraguay, Uruguay, Venezuela)

SABIC® HDPE M80064S - 00900 complies with the relevant requirements of the Annex ("Disposiciones generales para envases y equipamientos plásticos en contacto con alimentos") to Resolution GMC No. 56/92, as amended by Resolution GMC No. 20/2021.

Monomers in **SABIC® HDPE M80064S - 00900** are listed on Resolution GMC No. 02/12 “Reglamento Técnico Mercosur sobre lista positiva de monómeros, otras sustancias de partida y polímeros autorizados para la elaboración de envases y equipamientos plásticos en contacto con alimentos”, and amendments up to and including Resolution GMC No. 28/24.

Additives in **SABIC® HDPE M80064S - 00900** are listed on Resolution GMC No. 39/19 “Reglamento Técnico Mercosur sobre lista positiva de aditivos para materiales plásticos destinados a la elaboración de envases y equipamientos en contacte con alimentos”, and amendments up to and including Resolution GMC No. 22/24.

For adequate information about substances that are subject to restrictions and/or specifications set out in the aforementioned regulations, please refer to the information given at the end of this document.

Brazil

SABIC® HDPE M80064S - 00900 complies with the relevant requirements of Resolution RDC No. 105/1999, and amendments up to and including Resolution RDC No. 589/2021.

Monomers in **SABIC® HDPE M80064S - 00900** are listed on Resolution RDC No. 56/2012 “Resolução da Diretoria Colegiada sobre a lista positiva de monômeros, outras substâncias iniciadoras e polímeros autorizados para a elaboração de embalagense equipamentos plásticos em contato com alimentos” and amendments up to and including Resolution - RDC No. 961/2025.

Additives in **SABIC® HDPE M80064S - 00900** are listed on Resolution RDC No. 326/2019 “Resolução da Diretoria Colegiada sobre a lista positiva de aditivos destinados à elaboração de materiais plásticos e revestimentos poliméricos em contato com alimentos e dá outras providências” and amendments up to and including Resolution - RDC No. 963/2025.

For adequate information about substances that are subject to restrictions and/or specifications set out in the aforementioned regulations, please refer to the information given at the end of this document.

<u>Middle East</u>

GCC (Bahrein, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates)

Monomers and additives in **SABIC® HDPE M80064S - 00900** are listed as authorised for materials in Table 1 of Gulf Technical Regulation GSO 1863:2021 (cancelling and replacing Gulf Technical Regulation GSO 1863:2013).

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It has to be noted that Gulf Technical Regulations GSO 2231:2012 (General Requirements For The Materials Intended To Come Into Contact With Food), GSO 839:2021 (Food Packages - Part 1: General Requirements) and GSO 1863:2021 (Food packages - Part 2: Plastic package - General Requirements) typically set general (technical performance) requirements for materials and articles, that in their finished state as final article, are intended to or reasonably expected to contact food. SABIC materials are plastic intermediate materials to be converted into final articles. SABIC does not produce final articles. It is the responsibility of the producer of the final article to check if the materials supplied by SABIC and final articles made out of it are suitable for the intended use and comply with all applicable regulations and requirements.

For adequate information about substances that are subject to restrictions and/or specifications set out in the aforementioned standard, please refer to the information given at the end of this document.

Asia Pacific

The People's Republic of China (PRC)

GB4806.1-2016

PRC National Standard GB4806.1-2016 "General safety requirements for food contact materials and articles", as applicable to plastic basic resins, for the following aspects:

- **Traceability**

  Systems are in place that identify suppliers and customers one step forward / one step back in the value chain.

- **Product information**

  When supplied to China, the material packaging will contain (in Chinese language): product name and material type; name, address and contact details of manufacturer and/or seller; date of manufacture and reference to declaration of compliance with relevant applicable Chinese standards.

- **Declaration of Compliance / Supporting Documentation**

  This material will be accompanied by a written declaration, stating it complies with the relevant applicable Chinese food contact standards.
  Appropriate supporting documentation is available for competent authorities on their demand to demonstrate such compliance. This documentation will be renewed in case of substantial changes.

- **Specific measures**

  All components that comprise **SABIC® HDPE M80064S - 00900** are either listed or exempted from listing according to PRC National Standards GB4806.7-2023 and GB9685-2016, regulating plastic materials and articles intended to come into contact with foodstuffs.

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Note: Annex A.1 of PRC National Standard GB4806.7-2023 specifies a list of approved polymer resins with their chemical name and CAS RN. It also specifies the generic class and name of restricted monomers (if any) and corresponding SML/QM levels. PRC National Standard GB4806.7-2023 does not list CAS RN or GB9685-2016 FCA number of restricted monomers.
Considering the complexity of monomer chemical names, if a restricted monomer's GB9685-2016 FCA number is available, SABIC will provide this identification number and its corresponding SML/QM level. QM levels will be consistent between GB4806.7-2023 and GB9685-2016 (if available).

- **Basic requirements**

  In accordance with the guiding principles to avoid duplication of compliance work and to conduct compliance work as early as possible in the manufacturing chain, SABIC has conducted hazard assessments in accordance with section 3.1 under standard conditions on standard test specimens. Due to its position as a raw material supplier, SABIC cannot assess exposure under each and every actual or foreseeable condition of use of the finished article, wholly or partly composed of **SABIC® HDPE M80064S - 00900.**

  However, in order to support our customers to conclude on their own compliance work required by section 3.1, upon specific request, based on customer's exposure assessment, SABIC may provide hazard information relevant for **SABIC® HDPE M80064S - 00900**

- **Good Manufacturing Practice (GMP)**

  This material has been manufactured outside the People's Republic of China, but in accordance with the relevant requirements of the European Commission Regulation (EC) No. 2023/2006 on Good Manufacturing Practice (GMP) for materials and articles intended to come into contact with food. These requirements are similar to the requirements of PRC National Standard GB 31603-2015 (Chinese GMP standard).

GB4806.7-2023

SABIC® HDPE M80064S - 00900 contains the following resin(s) that is (are) listed in PRC National Standard GB 4806.7-2023 "Plastic Materials in Contact with Food and Their products", Table A.1, and complies with any applicable requirements for that (those) resin(s):

- Entry 139 (polyethylene homopolymer, CASRN 9002-88-4).

GB9685-2016

All intentionally added additives used in the production of **SABIC® HDPE M80064S - 00900** that are subject to PRC National Standard GB 9685-2016 regulating the use of additives in food contact materials and products:

- are listed in Table A.1 of PRC National Standard GB 9685-2016 (incl. Amendment No. 1 of March 16, 2025), or are listed in Table A.2 of PRC National Standard GB 2760-2014, regulating the use of food additives,

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- or are approved via NHC Approval Notices with corresponding application scope and specific requirements.

For adequate information about substances that are subject to restrictions and/or specifications and possible material restrictions (if any) set out in the aforementioned standards, please refer to the information given at the end of this document.

Malaysia

Monomers and additives in **SABIC® HDPE M80064S - 00900** are listed as authorised on Annex A and B, respectively, of Malaysian standard MS 2234:2009 on Plastics materials and articles intended to come into contact with food.

For adequate information about substances that are subject to restrictions and/or specifications set out in the aforementioned standard, please refer to the information given at the end of this document.

The republic of India

SABIC® HDPE M80064S - 00900 comprises a basic resin that is listed in Indian Standard IS 16738:2018 (Positive List of Constituents of Polyethylene and Polypropylene in Contact with Foodstuffs, Pharmaceuticals and Drinking water), superseding IS 10141:2001 and IS 10909:2001.

The intentionally added additives present in **SABIC® HDPE M80064S - 00900** are listed, and fulfill the requirements mentioned, in Table 1 “Auxiliary Items” of Indian Standard IS 16738:2018 (Positive List of Constituents of Polyethylene and Polypropylene in Contact with Foodstuffs, Pharmaceuticals and Drinking water), superseding IS 10141:2001 and IS 10909:2001.

SABIC® HDPE M80064S - 00900 does not contain additives with a migration limit as mentioned in Table 1 of the Indian Food Safety and Standards (Packaging) Regulations 2018 of December 24, 2018.

Japan

Specifications and Standards for Food, Food Additives, Etc. (Ministry of Health and Welfare Notification No.370 of 1959), as amended by MHLW Public Notice No. 324 of November 30, 2023 (revised by Cabinet Office Notice No. 128 of September 27, 2024) and Cabinet Office Notice No. 91 of April 28, 2025.

Japanese authorities introduced a Positive List System based on the Act Partially Amending the Food Sanitation Act, Etc. (Act No. 46 of 2018) that was promulgated on June 13, 2018, and entered into force on June 1, 2020. The system only permits use of substances proven safe as raw material of food utensils, containers and packaging. The standards are specified in Appendix 1, Table 1 (Base material) and Table 2 (Additives) of Public Notice No. 370 (“the Positive List”) pursuant to MHLW Public Notice No. 196 of April 28, 2020, and are applied since June 1, 2020. Transitional measures were set until May 31, 2025, and the notice will become effective on June 1, 2025.

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The Positive List started with substances that have been already used as raw material of food utensils, containers and packaging since before the enforcement date of the Positive List System (June 1, 2020). The substances listed in the Positive List are those selected by the MHLW based on information at present time. New substances may be added and the current information or regulations in the list may be revised.

The base polymer of **SABIC® HDPE M80064S - 00900** is listed in the latest version of Appendix 1, Table 1 (Base material) and belongs to Polymer Group 2. Additives are listed in Appendix 1, Table 2 (Additives) and meet the requirements that apply to Polymer Group 2.

It is the responsibility of the finished material and/or article manufacturer to determine suitability of **SABIC® HDPE M80064S - 00900** for use with various food types and temperature conditions of end use.

The latest published lists and detailed information on the Positive List System for Food Utensils, Containers and Packaging is available through the Japanese Consumer Affairs Agency (CAA) via:

https://www.caa.go.jp/policies/policy/standards_evaluation/appliance/positive_list (until May 31, 2025)
https://www.caa.go.jp/policies/policy/standards_evaluation/appliance/positive_list_new (from June 1, 2025)

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General information

We request you to use information contained in this document for compliance purposes only.

We wish to stress that test results referred to in this declaration are performed on standard test specimens under standardized testing conditions. These results may differ significantly from the performance of the finished plastic material or article under actual and foreseeable conditions of use and may not be used to demonstrate regulatory compliance of finished plastic materials or articles.

SABIC recommends users to take appropriate precaution during transportation, storage and use of SABIC products to avoid contamination and deterioration.

SABIC makes no recommendation for suitability of this SABIC product in the downstream user's intended application. SABIC has no control over finished plastic materials or articles nor over their manufacturing, processing and use conditions and can never accept any responsibility for compliance of these finished plastic materials or articles. SABIC cannot be held responsible for changes that may result from further processing of its product by other parties in the supply chain. It is the responsibility of downstream users to determine whether their use of SABIC products in a particular application is suitable and to check compliance of their final product with relevant regulations. Material or product performance in the end application should be validated through proper end use testing based on the information provided by the supply chain.

This declaration is restricted to **SABIC® HDPE M80064S - 00900** as it leaves the production facilities. This declaration does not cover:

- Any substance subsequently added by downstream users.
- Poor material or finished article quality due to inexpert manufacture by downstream users.
- Any negative influence of the finished article on the organoleptic properties of the packaged food

To the best of our knowledge, the information contained in this declaration is accurate and reliable as of its date of publication. Please note carefully that regulations develop continuously and that SABIC declarations may be adapted accordingly. This declaration replaces all previous versions relating to this subject and/or product and will be valid for a period of 1 (one) year, or until it is expressly replaced by a newer one, whichever is earlier, at which point this declaration will automatically expire.

If you have any further questions, or require any additional information on the above, please use the *"Contact Us"* form on the SABIC website. After selecting the option "Products" and your product, choose *"Regulatory"* as option under *"What is the nature of your inquiry"*.
The form is available via https://www.sabic.com/en/contact.

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Attachment

We request you to use the identity and information of disclosed substance(s) for compliance purposes only.

SUBSTANCES SUBJECT TO RESTRICTIONS OR SPECIFICATIONS

References to substance identifications in this section come from Annex I of EU Regulation (EU) 10/2011 (FCM substance No), PRC National Standard GB9685-2016 (FCA number) and/or US FDA Code of Federal Regulations (CFR), Title 21.

Substances that are intentionally used in or added to **SABIC® HDPE M80064S - 00900** comply with the compositional requirements set out in Chapter II of EU Commission Regulation (EU) 10/2011, and amendments. **SABIC® HDPE M80064S - 00900** does not release metal / ammonium substances (if present as impurities) in quantities exceeding the specific migration limits listed in Table 1 *"General list of migration limits for substances migrating from plastic materials and articles"* of Annex II of EU Commission Regulation (EU) 10/2011, amended by Commission Regulation (EU) 2025/351. This was determined by migration estimates following a worst-case calculation, assuming 100% migration, or migration modelling using an EU-recognized mathematic migration model, or migration experiments during 10 days at 60°C, using a S/V ratio of 6 dm²/kg and the same type of test specimen as mentioned in the European Union (EU) section, made of **SABIC® HDPE M80064S - 00900** or a comparable grade in food simulant B (according to Table 1 of Annex III of Commission Regulation (EU) No 10/2011).

This material may contain the following substances that are regulated with a restriction or specification in their use:

- Butanedioic acid, 1,4-dimethyl ester, polymer with 4-hydroxy-2,2,6,6-tetramethyl-1-piperidine-ethanol (CASRN 65447-77-0), which is regulated with a specific migration limit of 30 mg/kg food in the EU (FCM substance No 716) and in China (FCA0702). In the USA, this substance is listed in CFR, Title 21, paragraph 178.2010.

This material contains the following additives that are regulated as dual use additives in Europe:

- Calcium stearate (CASRN 1592-23-0, E470a).

According to the recipe in the production of **SABIC® HDPE M80064S - 00900** the following substances as such are not intentionally used or added:

- Primary Aromatic Amines (PAA), including those listed in Appendix 8 to entry 43 of Annex XVII to Regulation (EC) No 1907/2006 (EU REACH) and amendments, or listed in Table A.1 of Appendix A to China National Standard GB 31604.52-2021.

  The absence of these substances has not been checked by tests.

Based upon information received from raw material suppliers or manufacturers and/or knowledge of the presence of genotoxic substances, we can inform you that SABIC® HDPE M80064S - 00900 does not contain intentionally added genotoxic substances, originating from

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the used raw materials in the manufacturing process or degradation products thereof, that foreseeably give rise to a migration from the final material > 0.00015 mg/kg food simulant, determined by a worst-case calculation (assuming 100% migration), or migration modelling using an EU-recognized mathematic migration model, or migration experiments during 10 days at 60°C using standard test specimens, an SV ratio of 6 dm²/kg and standard food simulants (according to Table 1 of Annex III of Commission Regulation (EU) No 10/2011).

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SABIC® TRUCIRCLE™ certified circular and certified bio-renewable products

SABIC aspires to provide its customers with more sustainable solutions to accelerate the circular carbon economy. SABIC launched its TRUCIRCLE™ certified circular and certified bio-renewable portfolio in an effort to transform today's linear economy into a sustainable circular economy for plastics.

The chemical recycling concept of SABIC® TRUCIRCLE™ certified circular and certified bio-renewable polymers is referred to as advanced or feedstock recycling. It is based on thermal conversion technologies to produce pyrolysis oil (circular) or bio-based (bio-renewable) feedstocks as primary outputs. These are used as alternative cracker feedstock sources to (partly) replace traditional cracker feedstocks [a)]. The application of feedstock recycling in the manufacture of SABIC® TRUCIRCLE™ certified circular and certified bio-renewable polymers ensures that these polymers are identical to their traditional feedstock-based counterparts in both technical and regulatory respect. They are drop-in replacements for their traditional feedstock-based counterparts for use, under the same conditions, in all application areas without need for additional measures.

At this moment, there are two ways to identify SABIC® TRUCIRCLE™ certified circular and certified bio-renewable products [b)]. The first way is via specific suffixes that are added to the names of their original traditional feedstock-based counterparts. The second way is through feedstock indicators in combination with the name of the original traditional feedstock-based products. These indicators are displayed in the customer portal and/or mentioned on invoice / shipping documentation. Both naming options are depicted in tables 1 and 2 below:

Suffix	Feedstock origin
C	Mixed Plastic Waste
CO	Ocean Bound Plastic
L	Lubricant Oil Wastes
T	End-of-life Tyres
B	Crude Tall Oil
BU	Used Cooking Oil
BV	Vegetable Oil Processing Residues

Table 1. Product identification via suffixes

Indicator	Feedstock origin
TRUCIRCLE™ Circular MPW	Mixed Plastic Waste
TRUCIRCLE™ Circular OBP	Ocean Bound Plastic
TRUCIRCLE™ Circular TPO	End-of-life Tyres
TRUCIRCLE™ Circular LOW	Lubricant Oil Wastes
TRUCIRCLE™ Renewable CTO	Crude Tall Oil
TRUCIRCLE™ Renewable PFAD	Vegetable oil processing residues
TRUCIRCLE™ Renewable UCO	Used Cooking Oil

Table 2. Product identification via indicators

Example: SABIC® HDPE M80064S - 00900 (TRUCIRCLE™ Bio-renewable UCO) is a TRUCIRCLE™ certified bio-renewable version of traditional feedstock-based SABIC® HDPE M80064S - 00900.

The content of this document equally applies to the TRUCIRCLE™ certified circular and certified bio-renewable variants of traditional feedstock-based SABIC® HDPE M80064S - 00900.

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What about the new European Union (EU) legislation on the safety of Food Contact Materials ('FCMs') made of recycled plastics?

The EU Commission adopted Commission Regulation (EU) 2022/1616 on "recycled plastic materials and articles intended for food contact" on September 20, 2022 [c]. This regulation replaces Regulation (EC) No. 282/2008 and became effective on October 10, 2022.

Article 1(3) of the new regulation states that it does not apply to the use of waste to manufacture substances included in the Union list of authorized substances ("EU Positive List") as per Article 5 of Commission Regulation (EU) 10/2011 [d]. With reference to Commission Regulation (EU) 10/2011, the monomers directly obtained from bio-based sources or indirectly obtained from plastic waste through the advanced or feedstock recycling concept are:

- Listed on the "EU Positive List" (Annex I, Table 1) as per Article 5.
- Compliant with general and specific requirements as per Articles 8 and 9.
- Used according to the applicable rules of that regulation.

Furthermore, SABIC® TRUCIRCLE™ certified circular and certified renewable polymers produced from these monomers conform to all relevant compositional, restriction, and specification requirements stipulated in Commission Regulation (EU) 10/2011 to ensure their safety and quality.

Based on the above, SABIC interprets that Commission Regulation (EU) 2022/1616 (and amendments) does not apply to SABIC® TRUCIRCLE™ certified circular and certified bio-renewable polymers and the feedstock recycling method used for their monomers. SABIC® TRUCIRCLE™ certified circular and certified bio-renewable polymers can be used to produce Food Contact Materials (FCMs) without additional considerations or reservations. It is important to note that this statement is only valid if their corresponding traditional feedstock-based counterparts are also food contact compliant. It remains the responsibility of downstream users to verify compliance with relevant regulations and validate material or final article performance in the end application based on information provided by the supply chain.

a) Additional supply sources may be added in the future.
b) Product naming options may differ between product portfolios and may be subject to change. Customers will be informed accordingly.
c) Official Journal of the European Union, L243, 20 September 2022.
d) Commission Regulation (EU) 10/2011 on plastic materials and articles intended to come into contact with food, including subsequent amendments that are in force at the effective date of this document.

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客户有责任确认， SABIC 提供的材料和以 SABIC 提供的材料为原料而制造的产品是否适合预期的用途， 并符合相关的法规、规章与标准要求。

SABIC,作为塑料中间材料的制造商，确认 SABIC® HDPE M80064S - 00900 产品是按如下食品接触材料推荐或法规的有关要求，规范产品配方并生产：

<u>亚太地区</u>

中华人民共和国

GB4806.1-2016

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- **可追溯性**

  我司已建立了产品可追溯体系，以追溯价值链中前/后步骤的供应商和客户。

- **符合性声明/支持性文件**

  我司将提供该材料的书面符合性声明，声明该材料符合有关食品接触材料法规要求。

  在主管机构的特别要求时，我司将提供符合性声明相关的支持性文件，以证明其合规性。如发生重要变化时，我司将及时更新支持性文件。

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- **产品信息**

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- **特殊规定**

  SABIC® HDPE M80064S - 00900 产品的所有组分，均符合GB4806.7-2023《食品安全国家标准食品接触用塑料材料及制品》、GB9685-2015《食品安全国家标准 食品接触材料及制品用添加剂使用标准》和相关NHC(中国卫健委)公告的限制规定，或可按相关食品安全国家标准规范而豁免。

  备注: GB 4806.7-2023《食品安全国家标准食品接触用塑料材料及制品》批准了中国允许使用的树脂清单，该标准的附表A.1 规定了每个聚合物的化学名、化学文摘号 (CAS RN)、通用类别名、限制性单体的化学名称及其SML/QM限量。该标准中未给出限制性单体的化学文摘号 (CAS RN) 或中国国标GB9685-2016 FCA物质编号。考虑到单体化学名称的复杂性，如果一个单体在GB9685-2016中存在FCA 物质编号，SABIC 除了明示限制性单体名称外，也会公布GB9685-2016 FCA物质编号，该单体的SML/QM限量水平会与GB4806.7-2023 和GB9685-2016(如存在) 一致。

- **基本要求**

  根据食品接触用材料安全指导原则，为避免重复的合规工作以及尽早在制造链中开展合规工作，按照该标准第3.1节的要求，SABIC已使用标准测试样品在标准条件下进行了危害安全评估。但作为原材料供应商，SABIC无法评估由全部或部分的SABIC® HDPE M80064S - 00900产品组成的制成品在实际或者预期可能的所有使用条件的暴露情况。

尽管如此，为了支持我们的客户能够按照该标准第3.1节的要求完成具体客户的合规工作，当特别提出要求时，基于客户提供的暴露场景资料，SABIC可能会提供SABIC® HDPE M80064S - 00900产品相关的危害信息。

- **良好生产规范（GMP）**

  该产品在中国境外生产，其生产过程符合欧盟委员会(EC) 第 2023/2006号法规-关于预期接触食品的材料和制品的良好生产规范(GMP)的相关要求。这些要求与GB 31603-2015 《食品安全国家标准 食品接触材料及制品生产通用卫生规范》(中国GMP标准)的相关要求相似。

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GB4806.7-2023

SABIC® HDPE M80064S - 00900 产品中的树脂列于GB4806.7-2023《食品安全国家标准 食品接触用塑料材料及制品》附录A.1, 并且符合所有对应树脂的相关要求:

- 第139 (乙烯均聚物；聚乙烯,化学文摘号9002-88-4。)

GB9685-2016

SABIC® HDPE M80064S - 00900 产品中的所有有意添加使用的添加剂均符合GB9685-2016《食品安全国家标准 食品接触材料及制品用添加剂使用标准》的相关规定：

- 列于GB9685-2016《食品安全国家标准 食品接触材料及制品用添加剂使用标准》之表A.1(食品接触用塑料材料及制品中允许使用的添加剂及使用要求)，包括2025年3月16日第1號修正案，或列于GB2760-2014 《食品安全国家标准 食品添加剂使用标准》之表 A.2 (可在各类食品中按生产需要适量使用的食品添加剂名单)，
- 或经中国国家卫生健康委员会(NHC)相关批准公告(包括相应的应用范围和特别要求)批准。

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在**SABIC® HDPE M80064S - 00900**中有意使用或添加的物质符合欧盟法规(EU)10/2011及其修正案第 II 章中规定的成分要求。**SABIC® HDPE M80064S - 00900**不会释放超过欧盟法规(EU)10/2011及其修正案(EU)2025/351附件二之表1 “从塑料材料和制品迁移的物质迁移限值的一般清单”中所列出的特定迁移限值的金属/铵物质(如以杂质形式存在)。这是通过假设100%迁移的最坏情况计算进行的迁移估计，或通过使用欧盟认可的数学迁移模型进行迁移建模，或通过使用SABIC® HDPE M80064S - 00900或类似牌号按照欧盟(EU)章节中提到的类型制成试样，使用6 dm^2/kg的S/V比，在食品模拟物B（根据欧盟委员会第10/2011号条例附件三表1）中，于60℃下进行10天的迁移实验来确定。

本产品使用时，涉及可能涉及如下有 SML/SML(T) 限制, QM 限制和/或其它限制的物质。

- 丁二酸二甲酯和4-羟基-2,2,6,6-四甲基-1-哌啶乙醇的聚合物 (CAS RN 65447-77-0), 欧盟FCM No. 716, 中国FCA0702, 特殊迁移限量 SML = 30 mg/kg (食品)。该物质经美国联邦法典21CFR第178.2010章节批准。

本产品含以下欧盟法规规定的双用用途类添加剂(即可能被同时用于食品直接添加剂及食品接触材料的添加剂)：

- 硬脂酸钙(CAS RN 1592-23-0, E470a)。

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