

# **REGULATORY INFORMATION SHEET** FOAM FAMILY: Synergy, Ethafoam and Stratocell

#### **REGULATIONS & DIRECTIVES**

- SEC Conflict Mineral Regulations
- PMUC Homologation
- RoHS 3 2015/863/EU Directive
- REACH Regulation (EC) N° 1907/2006
- Packaging & Packaging Waste Directive
- Persistant Organic Pollutants
- Ozone Depleting Substances Montreal Protocol
- Fluorinated greenhouse gases

#### SUBSTANCES OF CONCERN TO OUR CUSTOMERS

- Allergenic Substances
- Animal Derived Substances
- Bisphenol A BPA and Bisphenol S BPS
- Heavy Metals
- Phthalic Acid Plasticizers phthalates-
- Natural Rubber latex -
- Other Substances

#### OTHER

• Chemistry policies

This document aims at providing information relative to regulatory aspects and voluntary policies to our customers. All statements reported here are reviewed by SEALED AIR's technical and legal experts and are released based on data and knowledge considered to be true and accurate. It shall be noted however that the information contained therein shall not be interpreted to guarantee that the product is suitable for its intended use and it is the responsibility of the user to ensure that the product is technically suitable for the purpose for which it is being used. The information is applicable to all Foam family products manufactured, distributed or imported by SEALED AIR within the European Union and the European Free Trade Area.

# **REGULATIONS & DIRECTIVES**

## **SEC Conflict Mineral Regulations**

The Securities and Exchange Commission adopted a rule to require companies to publicly disclose their use of conflict minerals that originated in the Democratic Republic of the Congo (DRC) or an adjoining country.

The regulatory reform law directed the Commission to issue rules requiring certain companies to disclose their use of conflict minerals that include tantalum, tin, gold, or tungsten if those minerals are "necessary to the functionality or production of a product" manufactured by those companies.

Please refer to <u>https://sealedair.com/file/sealed-air-corporation-conflict-minerals-policy</u> to view Sealed Air Corporation's Conflict Mineral policy.

#### **PMUC Homologation**

PMUC - Produits et Matériaux Utilisés en Centrale Nucléaire. - is an acronym used to define the Products and Materials Used in nuclear power station - It is a technical norm implemented by EDF to authorize the products and materials which can be used.

Our - **Ethafoam<sup>®</sup> Synergy<sup>®</sup>** product - structure passes the first step of the homologation process.

The analysis was performed on our product by a laboratory accredited by EDF in order to demonstrate this absence of Fluorine, Chlorine, Sulfur and Bromine.

Under some conditions these elements can be, aggressive and initiated corrosion from for metal (stainless steel and ferritic steel).

The second one is under the responsibility of our customers as future final user. You need to contact: EDF UTO - Noisy le Grand France.

The user will have to justify the advantages and the interest to use Ethafoam<sup>®</sup> Synergy<sup>®</sup> in comparison with the ones already validated. Please contact us to have the name and phone number of the right contact.

#### REACH - Regulation (EC) N° 1907/2006

We, SEALED AIR, herewith declare that our products do not contain SVHC - SVHC list updated to June 2018 - in a quantity exceeding 0.1% by weight.

A list of Substances of Very High Concern (SVHC) is periodically published by the ECHA - European Chemical Authority -. These substances are subjected to obligations which include information to users when they exceed 0.1% by weight in the finished product.

## RoHS 3 - 2015/863/EU Directive

The RoHS 2 directive - 2011/65/EU – whose the annex II has been amended by the delegated Directive (EU) 2015/863 called RoHS 3 regulates the restriction of the use of certain hazardous substances in electrical and electronic equipment. Nevertheless, we would like to inform you that Sealed Air's products do not contain any substances that are regulated by the RoHS directives.

None of the ten following substances have been intentionally added to these products during the manufacturing process and would not be expected to be present in amounts greater than 100 ppm by weight for:

- Lead (Pb)
- Cadmium (Cd)
- Mercury (Hg)
- Hexavalent chromium (Hex-Cr)
- Polybrominated biphenyls (PBB)
- Polybrominated diphenyl ether (PBDE)
- Phthalates (DEHP, BBP, DBP and DIBP).

### Packaging & Packaging Waste Directive

PRODUCT CARE foam materials fulfil the requirements in the European Directive 94/62/EC of December 20<sup>th</sup>, 1994 on packaging and packaging waste, and subsequent amendments. Measures to minimize use of resources - materials and energy - while maintaining high products performances have been adopted during the whole phase of the design and manufacturing of our products.

All our products fulfil the relevant CEN norms and comply with the essentials requirements which are:

- Prevention by source reduction (EN 13428)
- Recovery by energy (EN 13431)
- Material recycling (EN13430)
- Re Use (EN 13429)
- Minimization of dangerous and hazardous substances
- Heavy metal content: less than 100 ppm

#### **Persistent Organic Pollutants**

Our products comply with the Regulation (EC) No 850/2004 of the European parliament and of the Council of 29 April 2004 on persistent organic pollutants and Regulation (EU) No 519/2012 of 19 June 2012 amending the previous one.

We do not used in our processes and plants, notably:

- Polycyclic aromatic hydrocarbon PAH
- Polychlorinated biphenyls PCB
- Polychlorinated terphenyls PCT
- Octabromodiphenyl ether \*
- Decabromodiphenyl ether \*
- Pentabromodiphenyl ether \*
- Hexabromcyclododecane

\* These 3 substances are used as flame retardants.

#### **Ozone Depleting Substances - Montreal Protocol**

We hereby declare that our Product Care Packaging and Construction PE foams do not contain any Groups ozone depleting substances including CFC, HCFC and HFC. These substances are not used in our production plants.

They comply with the Regulation (EC) No 1005/2009 of the European parliament and of the Council of 16 September 2009 on substances that deplete the ozone layer.

The blowing agent - Hydrocarbon gases - used in the production of our Polyethylene Foams have a **GWP** Global Warming Potential of 3. and an **ODP** Ozone Depletion Potential of 0. This information can be found on chemical literature.

#### Fluorinated greenhouse gases

Our products comply with regulation (EU) N° 517/2014 of the European parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006.

We do not used in our processes and plants, notably:

- Hydrofluorcarbone HFC
- Perfluorcarbone PFC

# SUBSTANCES OF CONCERN TO OUR CUSTOMERS

#### Allergenic Substances

Sealed Air PRODUCT CARE materials do not contain any substances - such as nuts, milk proteins, natural rubber and other relevant substances - neither of natural nor synthetic origin, that are regulated by the 2007/68/EC amending Annex III a to Directive 2000/13/EC.

#### **Animal Derived Substances**

We are not intentionally adding substances from animal origin to our packaging materials. Our manufacturing process does not employ components derived from an animal source. Based on this we expect that our products are free of the causative agent of Bovine Spongiform Encephalopathy - BSE -.

#### **Bisphenol A / Bisphenol S**

We, SEALED AIR, do not intentionally add BPA and BPS in our formulations. Bisphenol-A (2,2-bis(4-hydroxyphenyl) propane) is a substance used as monomer in the production of Polycarbonate. Bisphenol-A may also be used as constituent of thermo-set coatings of metal cans. BPS is a plasticizer used in order to replace BPA and also as reagent in some glues.

### **Heavy Metals**

The combined level of heavy metals Mercury, Cadmium, Lead and Chromium VI does not exceed 100 ppm in our products, as required by the European Directive 94/62/EC - see the section "Packaging & Packaging Waste Directive".

#### Phthalic Acid Plasticizers - phthalates -

We, SEALED AIR, declare that phthalates have not been intentionally added to Protective Packaging and Construction products. SEALED AIR proactively discontinued the intentional use of Phthalic Acid plasticizers in its products and inks formulations in 1993.

The term Phthalates identifies a much broader family of substances, used as plasticizers primarily in polyvinyl chloride industry to increase flexibility, transparency, durability, and longevity of plastics. These substances are being phased out as plasticizers of many products in the United States, Canada, and European Union due to legal provisions and growing environmental awareness.

#### Natural Rubber - latex-

Natural rubber is not intentionally added to products currently sold by SEALED AIR. Natural rubber is known to cause allergenic reactions and contact dermatitis in predisposed people.

#### **Other Substances**

PRODUCT CARE packaging and construction products are manufactured in accordance to the relevant laws or recommendations applicable to them.

The substances listed below are not intentionally added to our products. This list is not exhaustive.

- PVC and derivates
- Asbestos
- Arsenic
- Pentachlorophenol
- Organic tin compounds
- Short-chain paraffin chloride (C10-13)
- Formaldehyde
- Perfluoro-octane-sulfonic acid and its salts
- Benzotriazole and derivates
- Dimethylfumarate
- Phthalates
- Azo dye and pigment forming specified amines
- Polynaphthalene chloride
- Chlorine
- Di-O-Tolyl Guanidine DOTG
- Perfluorooctanoic Acid PFOA and its salts
- Nonylphenol and nonylphenol ethoxylate
- GADSL (Global Automotive Declarable Substance List)

# OTHER

## **Chemistry Policies**

SEALED AIR is well aware of its responsibilities as packaging producer intended to pack otherwise food, articles among other things, as employer and as a company which must and wants to respect our environment. Due to this fact, SEALED AIR wants to minimize the risks for its customers, the consumers, its employees, and our environment.

Taking all this into account, we implemented chemistry policies we want to highlight to our customers and share.

The first action done in this important matter was the replacement of the phthalates and its derivatives in our product structures and inks used over our printing process, 20 years ago. This decision was taken, by our European Regulatory Director on the endocrine effects which the scientific community started to highlight - See the section on Phthalates-.

The Sealed Air Sustainability Advisory Team worked with R&D and Legal departments and created the RCP, <u>Responsible Chemistry Policy</u>. The RCP formalizes Sealed Air's proactive approach to materials that are on the radar screen of regulators, customers, and environmental groups.

This latter sets prohibitions and restrictions on chemicals with environmental, health, safety and regulatory concerns.

The RCP categorizes materials into four lists:

- Banned List: Material prohibited from purchase and use
- Phase Out List: Material currently used in products, but no new products allowed
- Risk Management List: Material currently used in products, but use is restricted
- Watch List: Material flagged due to legislative, customer, NGO, or regulatory issue, which may affect use

Isabelle LE SAINT Principal regulatory specialist

All statements or recommendations are based on data and knowledge considered to be true and accurate at the time of printing but should be verified by the user. Since the conditions of use are beyond our control, we do not warrant the completeness or suitability for any intended purpose of any statement or recommendation, or the results to be obtained. Please read all statements or recommendations in conjunction with our conditions of sale including those limiting warranties and remedies which apply to all goods and services supplied by us. National or local legal requirements relating to health & safety at work and the protection of the environment shall be applicable in all cases.