

## PRODUCT REGULATORY SUMMARY

# Chiguard 1033

MANUFACTURER: CHITEC

DATE: 04/08/2021

### COMPOSITION

98% 2-ethyl-2'-ethoxy-oxalanilide (CAS No. 23949-66-8)

### ALLERGENS

None of the 26 allergens defined in the European Cosmetic Regulation (EU 1223/2009) have been intentionally added in the manufacturing process of Chiguard 1033 and therefore are not expected to be present.

Additionally, based upon the manufacturing process and intentionally added ingredients, there are no reasonable expectations for Chiguard 1033 to contain any of the food allergens listed below.

- Shellfish and crustaceans
- Milk and milk derivatives
- Peanuts
- Tree nuts
- Eggs
- Soy
- Wheat
- Fish

### ANIMAL CONTENT

Chiguard 1033 is manufactured completely from synthetic and manufactured materials and does not contain any raw materials that are produced from, or substances derived from animal origin.

Moreover, Chiguard 1033 is not derived from specific-risk materials as defined in European Commission Decision 97/534/EC. The manufacturing process does not use any ingredient of animal origin nor does this product come in contact with animal-derived products during storage and transportation.

Therefore, Chiguard 1033 is expected to be free from Transmissible Spongiform Encephalopathy (TSE) and Bovine Spongiform Encephalopathy (BSE).

### CALIFORNIA PROPOSITION 65

Chiguard 1033 is not expected to contain any substances known to the State of California to cause cancer, birth defects, or other reproductive harm, at levels which would require a warning under California Proposition 65, Safe Drinking Water and Toxic Enforcement Act of 1986 as of December 18, 2020.

## **CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT**

Barentz North America LLC fully supports California's efforts to protect human rights and enforce ethical labor practices under the California Transparency in Supply Chains Act of 2010 (SB 657). Barentz is proud of our reputation and record for integrity and respect in dealing with our own employees and expects nothing less of our suppliers in their dealings with their workforce. We work closely with our suppliers to ensure that they do not engage in or support forced labor or unlawful child labor.

We are committed to ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible. Additionally, we expect our suppliers to adopt and maintain terms of employment for their employees that comply with local law and the requirements of our Supplier Code.

## **CARCINOGENS, MUTAGENS, TOXIC FOR REPRODUCTION (CMR)**

Chiguard 1033 is not expected to contain any carcinogens, mutagens, or toxic for reproduction (CMR) substances outlined within Annex II of Council Directive 76/769/EEC.

## **CERTIFICATE OF ORIGIN**

Chiguard 1033 is produced in Taiwan. Therefore, this product does not qualify for the United-States-Mexico-Canada Agreement (USMCA).

## **CONEG (DIRECTIVE 94/62/EC)**

None of the toxic elements—Cadmium, Hexavalent Chromium, Lead, or Mercury—are used as raw materials nor deliberately added during the manufacturing process of Chiguard 1033. With this in mind, Chiguard 1033 is expected to be free from the above-mentioned toxic elements. Any incidental amount would be expected to be less than 100 parts per million (ppm).

## **CONFLICT MINERALS**

Barentz North America LLC is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Barentz North America LLC seeks to source products, components, and materials from companies that share our values around human rights, ethics, and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. "Conflict minerals" refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin, and tungsten, without regard to the location or origin of the minerals or derivative metals.

Barentz North America LLC supports industry-wide efforts to identify, reduce and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. Barentz North America LLC is committed to complying with any applicable requirements under the Conflict Minerals Rule.

Suppliers to Barentz North America LLC are expected to establish their own conflict minerals policies, due diligence frameworks, and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to Barentz North America LLC. In the event Barentz determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Barentz North America LLC reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

## **EU FOOD CONTACT (EUROPE)**

This substance is listed in Annex I of European Regulation 10/2011, regarding "plastic materials and article intended to come into contact with food", as authorized substances to be used as additives or polymer production aid. This substance is compliant under the condition that the finished article must meet the specific migration limit of 30 mg/kg.

- FCM substance number: 633
- EEC packaging material reference number 53200

## **FDA FOOD CONTACT (UNITED STATES)**

Not listed for use in FDA Food contact applications.

## **GB 9685 FOOD CONTACT (CHINA)**

This substance is compliant to China's Hygienic standards for uses of additives in food containers and packaging materials.

- FCA number: 0521
- Maximum Level (%): PVC: 0.5
- SML (mg/kg): 30

## GLOBAL INVENTORY STATUS

To the best of our knowledge, Chiguard 1033, with CAS number 23949-66-8, is either exempt from or can be found as a positive listing on the chemical inventories listed below

- Australia— Australian Inventory of Chemical Substances (AICS)
- Canada—Domestic Substances List (DSL)
- China—Inventory of Existing Chemical Substances Produced or Imported in China (IECSC)
- New Zealand— New Zealand Inventory (NZIoC)
- The Philippines— Philippine Inventory of Chemicals and Chemical Substances (PICCS)
- South Korea— Korean Existing Chemicals List (KECI)
- Taiwan— Taiwan Chemical Substance Inventory (TCSI)
- United States— Toxic Substances Control Act Inventory (TSCA)

## GLUTEN

Chiguard 1033 does not contain nor is it expected to come into contact with gluten or products containing gluten.

## IMPURITIES & ADDITIVES

Chiguard 1033 is not manufactured using nor expected to contain any of the substances listed below in detectable amounts.

- Phthalates
- Substances in Commission Regulation (EC) No 1895/2005 – BADGE/BFDGE/NOGE
- Perflouroalkylated Substances
- Nonylphenols
- Octylphenols
- Alkyl Phenol Ethoxylates – Octyl and Nonyl
- CMR Compounds
- GMOs
- PCBs
- Nanomaterials (300 nm or less)
- Colorants/Additives containing halogenated atoms
- Organotin compounds
- Bisphenol compounds

## **JAPAN FOOD CONTACT**

Chiguard 1033 is compliant with Japan's Ministry of Health, Labor, and Welfare (MHLW) food contact regulations.

- FCM substance number: 253
- Use Limit by Synthetic Resin Group [%] 1;2 2;- 3;0.5 4;1 5;- 6;- 7;-

## **KOSHER**

While Chiguard 1033 is not certified to be Kosher, we believe it to be compliant with Kosher regulations. The origin and source of the raw materials used for production of these products are chemical and mineral. No vegetable or animal source raw materials are used. These products do not contain any derivative from milk, milk products, cereals, pulse, grapes, or animals. The production plant where these products are produced does not produce or fill any products derived from milk, milk products, cereals, pulse, grapes, or animals.

## **MERCOSUR FOOD CONTACT (BRAZIL)**

Chiguard 1033 is compliant with MERCOSUR/SGT N° 3/CA/ACTA N° 01/07 food contact regulations. This substance is compliant under the condition that the finished article must meet the specific migration limit of 30 mg/kg.

## **REACH**

Chiguard 1033 has been registered in accordance with REACH regulation (EC) No 1907/2006 by the manufacturer of this product.

Please contact your Barentz North America LLC account manager to discuss any need for REACH Only Representative coverage.

## **RoHS**

The below substances listed in EU Directive 2015/863, also known as Restriction of Hazardous Substances (RoHS) 3, have not been intentionally added nor are they expected to be present in concentrations greater than the specified prohibited amounts in Chiguard 1033.

- Cadmium (<100 ppm, 0.01%)
- Lead (<1000 ppm, 0.1%)
- Mercury (<1000 ppm, 0.1%)
- Hexavalent chromium (<1000 ppm, 0.1%)
- Polybrominated biphenyls (PBB) (<1000 ppm, 0.1%)
- Polybrominated diphenyl ethers (PBDE) (<1000 ppm, 0.1%)
- Bis(2-ethylhexyl) phthalate (DEHP) (<1000 ppm, 0.1%)
- Butyl benzyl phthalate (BBP) (<1000 ppm, 0.1%)
- Dibutyl phthalate (DBP) (<1000 ppm, 0.1%)
- Diisobutyl phthalate (DIBP) (<1000 ppm, 0.1%)

## **SUBSTANCES OF VERY HIGH CONCERN (SVHC)**

None of the substances contained in the Candidate List of Substances of Very High Concern (SVHC) as of January 19, 2021 are intentionally used nor added in the manufacture of Chiguard 1033. Because the presence of the substances in the Candidate List are not expected under normal conditions, the absence has not been checked by tests.

### **DISCLAIMER**

The information contained in this document is based upon data obtained from the manufacturer. This information is offered only as a guide to the handling of this specific material and conditions. The use and handling of this material may require alternate and additional considerations. No representation or warranty of any kind whatsoever is given or implied by Barentz North America LLC with respect to any information contained herein. In no event or circumstance shall Barentz North America LLC be liable for any damages, losses, liabilities or injuries of any kind whatsoever arising from any information contained herein including, without limitation, all indirect, special or consequential damages or losses which may result from the information contained herein.