

# Regulatory Summary Americas Styrenics Prime Grade High Impact Polystyrene (HIPS)

A summary of the regulatory profile of our prime grade HIPS resins is provided below.

Please note the following:

1. The information presented in this document is not exhaustive. Additional Information may be found by consulting the relevant Safety Data Sheet (SDS), Technical Data Sheet or by contacting Customer Service.

# **Chemical Inventories**

United States Toxic Substances Control Act (TSCA) Inventory Listed (Active) Canada Domestic Substances List (DSL) Listed European Inventory of Existing Commercial Chemical Substances (EINECS) Listed or exempt **EC** Inventory Listed or exempt Chinese Chemical Inventory of Existing Chemical Substances (China IECSC) Listed China Catalog of Hazardous chemicals 2015 Not Listed New Zealand Inventory of Chemicals (NZIoC) Listed Philippines Inventory of Chemicals and Chemical Substances (PICCS) Listed Vietnam National Chemical Inventory Listed

# **U.S. FDA Food Contact Status**

When used unmodified and processed in accordance with good manufacturing practices for food contact applications, all prime grade AmSty HIPS resins will comply with the U.S. Food and Drug Administration's food additive regulation at 21 CFR § 177.1640, under the Federal Food, Drug, and Cosmetic Act. These products may be used to produce articles or components of articles used in contact with food for all food types described in Table 1 and Conditions of Use C-H described in Table 2 of U.S. FDA's regulation at 21 CFR § 176.170(c).

The preceding statement refers to regulatory requirements only, not to the physical utility of the product. The uses cited above are subject to good manufacturing practices and any limitations which are part of the regulations. It is the responsibility of the article producer or food packager to determine that the article is suitable for its intended use. The regulations should be consulted for complete details.

# Health Canada - Health Products and Food Branch (HPFB) No Objection Status

The HIPS resins listed below have been granted "No Objection" status for use in general food packaging applications by Health Canada's Food Packaging Materials Section of the Health Products and Food Branch (HPFB):

- STYRON™ 404 Natural Polystyrene
- STYRON™ 421 Natural Polystyrene
- STYRON™ 478 Natural Polystyrene
- STYRON<sup>TM</sup> 484 Natural Polystyrene
- STYRON<sup>TM</sup> 487 Natural Polystyrene
- STYRON™ 487R Natural Polystyrene
- STYRON™ 498 Natural Polystyrene
- STYRON™ A-TECH™ 1115 Polystyrene
- STYRON™ A-TECH™ 1170 Polystyrene
- STYRON™ A-TECH™ 1260 Polystyrene

- STYRON<sup>TM</sup> A-TECH<sup>TM</sup> 1400 Polystyrene
- EA6740 Rubber Modified HIPS
- EB6400 Rubber Modified HIPS
- EB6755 Rubber Modified HIPS
- EC6600 Rubber Modified HIPS

The Food Packaging Materials Section advises that each application is considered different even if the parameters are identical to another application for which they have previously offered an opinion.

Therefore, regardless of the above HPFB opinion, we recommend that you review the specifics of your application with HPFB and acquire the HPFB opinion regarding your specific application.

# European Commission Food Contact Regulation (EU) No. 10/2011

The compositions of AmSty's resins as supplied from our factory comply with the food contact requirements of Commission Regulation (EU) No. 10/2011.

- No substances, which are subject to a restriction in food based on EU-Directive 95/2/EC (Feb. 20 1995) incl. subsequent amendments like EU-Directive 2010/69/EU (Oct. 22, 2010), are present in these products.
- These resins are manufactured in accordance with good manufacturing practices as outlined in Commission Regulation (EC) No 2023/2006 of December 22, 2006.
- The raw materials used in the manufacture of these resins are of suitable purity for articles intended for use in contact with foodstuffs.

# **Drug Master File (DMF)**

The following products currently have a Drug Master File on file at the FDA:

- STYRON™ 478
- STYRON™ 498
- STYRON™ 484
- STYRON™ 487R
- STYRON™ 421

- EA6740
- EB6400
- EB6755
- EC6600

# **Animal Content/BSE/TSE**

AmSty polystyrene resins are not intentionally formulated with raw materials of animal origin. These products are formulated with raw materials that are either synthetic or derived from plant sources.

#### Allergen Content

AmSty polystyrene resins are not intentionally formulated with raw materials that originate from peanuts, soybeans, milk, eggs, fish, shellfish, tree nuts and/or wheat or gluten.

# **Biocompatibility - USP Class VI Plastics Certification**

The following products have been tested against the United States Pharmacopoeia <88> Biological Reactivity Tests *In Vivo* for Class VI Plastics and determined to be compliant with USP Class VI requirements.

- STYRON<sup>™</sup> 414
- STYRON™ 478
- STYRON™ 484

- STYRON<sup>TM</sup> A-TECH<sup>TM</sup> 1115
- EA6740
- EB6400

### California Prop 65

The compositions of the AmSty polystyrene products have been reviewed against the current Prop 65 list. Please refer to the SDS, Section 15 for more information.

## **Conflict minerals**

In accordance with the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, polystyrene resins manufactured by Americas Styrenics are not intentionally formulated with conflict minerals, such as tin, gold, tungsten, and tantalum.

## CONEG(Coalition of Northeastern Governors)/ EU Directive 94/62/EC

The heavy metals cadmium, hexavalent chromium, lead, or mercury are not intentionally added during the manufacture of our polystyrene resins. The sum of the concentration levels of these elements incidentally present is not expected to exceed 100 ppm. Therefore, our resins are compliant with CONEG and with the concentration levels of heavy metals specified in EU-Directive 94/62/EC.

# CMR Substances, Annex VI of CLP Regulation (EC) No. 1272/2008

AmSty polystyrene resins are not intentionally formulated with substances classified as sensitizers (Category 1) or carcinogenic, mutagenic or toxic for reproduction (CMR) (Category 1A, 1B, or 2 according to the criteria of Regulation (EC) No.1272/2008), above the concentration limits as defined in Sections 3.5.3.1 (Mutagen), 3.6.3.1 (Carcinogen) and 3.7.3.1 (Reproductive Toxicant).

# Cosmetic Products Regulation (EC) No 1223/2009

Regulation (EC) No. 1223/2009 is applicable to the European Union and its Member States. AmSty products are not intentionally manufactured or formulated with the below substances mentioned in the referenced regulation:

- substances classified as Category 1A or 1B CMR (carcinogenic, mutagenic, or reprotoxic), present above 0.1%
- substances classified as endocrine-disrupting, present above 0.1%. Refer to Annex 15, List of 66 substances with classification high, medium or low exposure concern: https://ec.europa.eu/environment/archives/docum/pdf/bkh\_annex\_15.pdf

### EU Regulation (EC) 2017/745

AmSty products are not intentionally manufactured or formulated with the below substances mentioned in Section 10.4.1 Design and manufacture of devices of Regulation (EU) 2017/745 on medical devices:

- a) substances which are carcinogenic, mutagenic or toxic to reproduction ('CMR'), of category 1A or 1B, in accordance with Part 3 of Annex VI to Regulation (EC) No 1272/2008 of the European Parliament and of the Council
- b) substances having endocrine-disrupting properties for which there is scientific evidence of probable serious effects to human health and which are identified either in accordance with the procedure set out in Article 59 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (2) or, once a delegated act has been adopted by the Commission pursuant to the first subparagraph of Article 5(3) of Regulation (EU) No 528/2012 of the European Parliament and the Council (3), in accordance with the criteria that are relevant to human health amongst the criteria established therein.

# EU REACH SVHC, Annex XIV Authorization List, Annex XVII Restricted Substance List

AmSty polystyrene resins are not intentionally formulated with any substance classified or listed on the REACH SVHC list, Annex XIV Authorization List, or Annex XVII Restricted Substances List. The most recent update to the SVHC list occurred on **June 10, 2022**.

# EU RoHS Directive 2011/65/EU (RoHS 3)

Polystyrene resins manufactured by Americas Styrenics are in compliance with the requirements of EU-Directive 2015/863/EU (RoHS 3). To the best of our knowledge, polystyrene resins manufactured by Americas Styrenics LLC (AmSty) are not intentionally manufactured or formulated with the following substances listed in Annex II of EU-Directive 2015/863/EU:

- Cadmium, hexavalent chromium, lead, and mercury
- Polybrominated Biphenyls (PBB)
- Polybrominated Diphenyl Ethers (PBDE)
- Bis(2-ethylhexyl) phthalate (DEHP)

- Butyl benzyl phthalate (BBP)
- Dibutyl phthalate (DBP)
- Diisobutyl phthalate (DIBP)

## **Nanomaterials**

A commonly used industry definition for engineered nanomaterials (< 100 nm in size) is any material that exhibits novel properties and behaviors as a result of being engineered at nano (1 to 100 nanometers) level. Polystyrene resins manufactured by Americas Styrenics are not intentionally manufactured or formulated with these engineered nanomaterials.

### **Ozone Depleting Substances**

AmSty polystyrene resins are not manufactured with Class I or II substances as defined in Title VI of the Clean Air Act of 1990 under the final rule published in the Federal Register on February 11, 1993 (58 FR 8136) or with substances listed in the EU 'Ozone Regulation' Regulation (EC) 1005/2009.

#### **Phthalates**

Polystyrene resins manufactured by Americas Styrenics are not intentionally formulated with any phthalate esters, including the below (not an exhaustive list). However, we do not analyze for these specific substances.

- Benzyl butyl phthalate (BBP), CAS# 85-68-7
- Bis-(2-ethylhexyl) phthalate or di-(2-ethylhexyl) phthalate, (DEHP), CAS# 117-81-7
- Bis-(2-methoxyethyl) phthalate, CAS# 117-82-8
- Dibutyl phthalate (DBP), CAS# 84-74-2
- Diisobutyl phthalate (DIBP), CAS# 84-69-5
- Dimethyl phthalate (DMP), CAS# 131-11-3
- Diisononyl phthalate (DINP), CAS# 28553-12-0
- Di-n-octyl phthalate (DNOP), CAS# 117-84-0
- Di-iso-decyl phthalate (DIDP), CAS# 26761-40-0

# **Underwriters Laboratories (UL)**

Many of our resins are UL listed. Click on the link for a list of resins: Americas Styrenics UL Listings

#### Substances

Polystyrene resins manufactured by Americas Styrenics are not intentionally formulated with the following regulated chemicals or substances of concern (not an exhaustive list):

- Antimicrobial agents, fungicides, insecticides, or pesticides
- Antimony and Antimony Compounds
- Arsenic and Arsenic Compounds
- Asbestos
- Azocompounds
- Azo colorants/azo dyes
- Barium and Barium Compounds
- Benzophenone
- Beryllium and Beryllium Compounds
- Butylated Hydroxyanisole(BHA)/ Butylated Hydroxytoluene(BHT)
- Biocides
- Bismuth and Bismuth Compounds
- Bisphenol Compounds
- Brominated Organic Compounds
- Cadmium & Cadmium Compounds
- Chlorine and Chlorinated Compounds
- Cobalt and Cobalt Compounds
- Hexavalent Chromium Compounds
- Dimethyl fumarate (DMF)
- Epoxy derivatives
- Formaldehyde

- Genetically Modified Organisms (GMOs)
- Human derivatives
- Latex or Natural Rubber
- Lead and Lead Compounds
- Melamine
- Mercury and Mercury Compounds
- Medicinal substances
- Nickel and Nickel Compounds
- Nitrocellulose
- Nitrosamine
- Nonyl Phenols(NP), Nonyl Phenol Ethoxylates(NPE)
- Organotins, including Tributyl Tin (TBT), Triphenyl Tin (TPT), and Tributyl Tin Oxide (TBTO)
- Persistent Organic Pollutants (POPs)
- Per-/polyfluoroalkyl substances (PFAS), including Perfluorooctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)
- Phthalates
- Polyvinyl Chloride (PVC)/PVC blends
- Radioactive Substances
- Selenium and Selenium Compounds

# **Americas Styrenics Medical Application Policy**

Americas Styrenics will not knowingly sell or sample any product or service ("Product") into any commercial or developmental application that is intended for

- permanent (long term) contact with internal body fluids or internal body tissues. "Long term" is defined as a use which exceeds 72 continuous hours.
- use in cardiac prosthetic devices regardless of the length of time involved (cardiac prosthetic devices include, but are not limited to, pacemaker leads and devices, artificial hearts, heart valves, intra-aortic balloons and control systems and ventricular bypass assisted devices).
- use as a critical component in medical devices that support or sustain human life.
- use in applications designed specifically to promote or interfere with human reproduction.

# **Contact Information**

Americas Styrenics LLC 24 Waterway Avenue, Suite 1200 The Woodlands, TX 77380 Phone (toll-free): 844-512-1212

Product Stewardship: productsteward@amsty.com

Customer Service : PSCS@amsty.com
Email: AmSty Corporate Communications

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