



TotalEnergies OneTech Belgium

Refining & Chemicals / Regulatory Affairs
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LETTER N° 23-ARP-L-0061

Feluy, April 4, 2023

POLYSTYRENE CRYSTAL 1540 grade as produced in Europe

REGARDING: FOOD CONTACT MATERIALS AND ARTICLES IN CHINA

GB 4806.1-2016: National Food Safety Standard General Safety Requirements for Food Contact Materials and Articles:

GB 31603-2015: General Hygienic Specifications for Production of Food Contact Materials and Articles

To the best of our knowledge, we confirm that the here-above mentioned Product has been manufactured according to the requirements laid down by the National Standard GB 31603-2015.

GB 4806.6-2016: National Food Safety Standard for Resins Used to Make Plastics in Contact with Foodstuffs

The here-above mentioned Product comprises a resin which is listed in GB 4806.6 Table A1, item 23 (Styrene Homopolymer and Copolymer with butadiene). We inform you that the here-above mentioned Product is a Styrene Homopolymer (more information in next section below).

We confirm that the here-above mentioned Product (or a specimen representative of this material) fulfils the requirement of Note 2: Dry weight loss (100°C, 3h) ≤ 0.2%; Volatile matter ≤ 1%; N-hexane extract (reflux, 2h) ≤ 1.5%.

We confirm that the here-above mentioned Product (or a specimen representative of this material) fulfils the requirements of the sensory index (item 4.2).

GB 9685-2016: National Food Safety Standard for Uses of Additives in Food Contact Materials and Articles

We confirm that any and all intentional additives¹ used in the manufacturing of the here-above mentioned Product sold and supplied by TotalEnergies Refining & Chemicals are listed for use in PS in the Table A.1 in GB 9685-2016 or in the Table A.2 of GB 2760-2014, National Food Safety Standard for Food Additive Use.

The dosage of these additives added in the here-above mentioned Product is below the maximum dosage permitted by GB 9685-2016. There is (are) a (some) substance(s) used in the formulation of this product for which a Specific Limit of Migration and/or Maximum Permitted Quantity specification has/have been set in GB 9685-2016. More information in the tables hereinafter.

However, we inform you that other ingredients not defined as additives¹ may be used in the manufacturing of here-above mentioned Product and are listed in the China Standard GB 9685-2016.

GB 4806.7-2016: National Food Safety Standard Food Contact Plastic Materials and Articles

We confirm that the here-above mentioned Product (or a specimen representative of this material) fulfils the requirements of the sensory index (item 4.2).

The tests for physical and chemical indexes specified in the 4806.7 "National Food Safety Standard Food Contact Plastic Materials and Articles" are not performed on the here-above mentioned Product.

¹ Additives according to the GB 9685-2016 are substances used during the production process of food contact materials and products intended to or assisting to improve their quality and characteristics; also include the processing aids added during the production process of the food containers and packaging materials to assist the production process but not intended to improve the quality and characteristics of end products.

Issued by an electronic system

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DISCLOSURE OF RESTRICTIONS ACCORDING TO GB 9685-2016:

Substances with restrictions as listed in the GB 9685-2016							
Serial N°	Substance Designation	Maximal Residual Level (ppm)	Max. Level (%) in PS	SML/QM (mg/kg)**	SML(T) (mg/kg)	SML(T) group N°	Other Requirements
FCA1298	Fatty Acids, C16-C18, Zinc Salts	910	3	25 (SML)***	-	-	-
CAS RN 75-07-0	Acetaldehyde	Traces*	-	-	6	1	-

* Non-Intentionally Added Substances - impurities or reaction products - with restrictions as mentioned in GB 9685-2016 may be present. The presence of these substances might depend on processing conditions. Therefore, we are not able to give a typical quantity of these substances occurring after processing of the polymer in your specific conditions of use. Some traces could be present in our resin, but to the best of our knowledge, theoretically, the restrictions would be met if the product is used in the appropriate conditions.

** QM stands for maximal residual quantity; ND for non-detectable; DL for detection limit; SML for Specific Migration Limit.

*** expressed as Zinc (Zn) in Annex C of GB 9685-2016

DISCLOSURE OF RESTRICTIONS ACCORDING TO GB 4806.6-2016:

Substances with Restrictions as listed in GB 4806.6-2016								
No.	English Name	CAS No.	Maximal Residual Level (ppm)	Category	SML/QM mg/kg*	SML(T) mg/kg	SML(T) Group No.	Other requirements
23	Styrene Homopolymer	9003-53-6	Ethylbenzene: 50 ppm Styrene: 500 ppm	PS	0.3% (Ethylbenzene: QM) 0.5% (Styrene: QM)	-	-	-

*: SML: Specific Migration Limit; QM: Maximum permitted quantity to remain in the food contact materials and products

It pertains also to downstream users to check by appropriate specific migration tests on the final material or article the suitability for contact with different food-types and various end-use conditions. However, these are beyond the control of TotalEnergies OneTech Belgium and are a part of the responsibility of the user of the above-mentioned Product.

General use conditions (food contact):

It pertains to downstream users of materials intended to come into contact with food, to ensure that the final materials or articles do not bring about an unacceptable change in the composition of the food or bring about a deterioration in the organoleptic characteristics which render it unfit.

It pertains to downstream users to check by appropriate tests on the final material or article the suitability for contact with different food-types and various end-use conditions. For high temperature applications tests shall be carried out under the worst foreseeable conditions of use in which physical or other changes do not take place and specific precautions must be taken during the end-use in the most severe temperatures to ensure that the polymer remains functional. The maximum testing temperature is governed by the phase transition temperature of the polymer.

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Notes:

This document does not automatically apply to subsequent revisions of GB 4806.1-2016 National Food Safety Standard General Safety Requirements for Food Contact Materials and Articles, GB 9685-2016 National Food Safety Standard for Uses of Additives in Food Contact Materials and Articles and GB 4806.6-2016 National Food Safety Standard for Resins Used to Make Plastics in Contact with Foodstuffs. Further revisions will be evaluated upon request by TotalEnergies OneTech Belgium at the time of publication of revisions

The information provided herein is based on the best available data that we believe to be reliable and to the best of our knowledge, which will apply only to the specific here-above mentioned Product sold and supplied by TotalEnergies Refining & Chemicals and does not apply to any use in any process or in combination with any other material.

This document is prepared and provided upon the request of and without charge to our customers. TotalEnergies OneTech Belgium makes no warranties, express or implied, and assumes no liability in connection with any use of this information.

DISCLAIMER:

Our Letter is only valid for the above-mentioned Product as far as it was bought from TotalEnergies or its distributor and does not cover:

- Any modification of the above-mentioned Product by any addition of any other product or ingredient to it;
- Any prejudicial modification of the above-mentioned Product resulting from a processing of it;
- An inadequate use and/or storage of the above-mentioned Product and/or of the finished articles.

Unless specifically indicated in a regulatory document, the products mentioned herein are not suitable for applications in the pharmaceutical or medical sector. Under no circumstances any products sold by TotalEnergies Refining & Chemicals are suitable for humans or animals in the following applications: (i) Implantable devices intended for human or animal body (ii) Devices intended to be used in contact with internal body fluids (iii) Devices intended to be used in contact with internal body tissues.

Information contained in this publication is true and accurate at the time of publication and to the best of our knowledge. The nominal values stated herein are obtained using laboratory test specimens. Before using one of the products mentioned herein, customers and other users should take all care in determining the suitability of such product for the intended use.

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The present Letter is valid for a period of 24 months starting from the date first above written and replaces any earlier Letter relating to this subject which should be considered null and void. Upon the expiration of this Letter, we can issue a new one at your request. In case of change during this period a new Letter will be issued automatically; kindly forward it to any recipient of the present Letter.

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