

TOTAL RESEARCH & TECHNOLOGY FELUY

Refining & Chemicals / Regulatory Affairs
rc.fer-regaffairs@totalenergies.com

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LETTER N° 21-ARP-L-0164

Feluy, September 29, 2021

POLYPROPYLENE PPH Aceso® PPM H250 grade as produced in Europe

STATEMENT OF COMPLIANCE FOR FOOD CONTACT MATERIALS AND ARTICLES IN CHINA

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

GB31603-2015: 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 74 (Polypropylene(homopolymer)) and complies with applicable provisions of Annex A for that resin. 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 additives (*) used in the manufacturing of here-above mentioned Product sold and supplied by TOTAL REFINING & CHEMICALS are listed for use in PP in the Table A.1 in GB 9685-2016, The National Food Safety Standard for Uses of Additives in Food Contact Materials and Articles. The dosages of these additives added in the here-above mentioned Product are 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 been set in GB 9685-2016. More information in the next section here below.

However, we inform you that other ingredients not defined as additives (*) could 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

The tests specified in the 4806.7 “National Food Safety Standard Food Contact Plastic Materials and Articles” are not performed on the here-above mentioned Product.

GB 2760-2014: National Food Safety Standard for Uses of Food Additives

We inform you that no additives(*) used in the manufacturing of the here-above mentioned Product are listed in the GB 2760-2014, The National Food Safety Standard for Uses of Food Additives.

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Zone Industrielle C – B-7181 Seneffe (Feluy)
Tél. : +32 (0)64 51 41 11 – E-mail : research-feluy@totalenergies.com



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Definition:

(*) Additives according GB 9685-2016 are substances used during the production process of food contact materials and products intended to or assisting to improve the 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.

DISCLOSURE OF RESTRICTIONS ACCORDING TO GB 9685-2016 AND GB 2760-2014:

Substances with restrictions as listed in the GB 9685-2016							
Serial N°	Substance Designation	Maximal Residual Level (ppm)	Max. Level (%) in PP	SML/QM (mg/kg)	SML(T) (mg/kg)	SML(T) group N°	Other Requirements
FCA0140	Benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, 1,1'-[2,2-bis[[3-[3,5-bis(1,1-dimethylethyl)-4-hydroxyphenyl]-1-oxopropoxy]methyl]-1,3-propanediyl] ester	1160	0.5	-	-	-	-
FCA1294	Octadecanoic acid, calcium salt	1270	5	-	-	-	-
FCA0165	Phenol, 2,6-bis(1,1-dimethylethyl)-4-ethyl-	Traces*	0.1	4.8	-	-	-
FCA0810	Peroxide, bis(1,1-dimethylethyl)	Traces*	0.1	-	-	-	-
-	Tert-butyl alcohol	Traces*	-	QM: 100	-	-	-

* 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.

Substances with restrictions as listed in the GB 2760-2014			
CNS	Substance Designation	Maximal Residual Level (ppm)	Max. Level (g/kg)
-	-	-	-

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 TOTAL RESEARCH & TECHNOLOGY FELUY and are a part of the responsibility of the user of the above-mentioned Product.

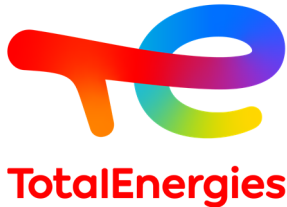
General use conditions (food contact)

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.

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Zone Industrielle C – B-7181 Seneffe (Feluy)
Tél. : +32 (0)64 51 41 11 – E-mail : research-feluy@totalenergies.com

SA TOTAL RESEARCH & TECHNOLOGY FELUY NV
RPM Charleroi 0438.021.316 T.V.A. BE 0438.021.316 – BNP Paribas Fortis IBAN BE48 2100 4738 2027 BIC GEBABEBB



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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.

Notes:

This document does not automatically apply to subsequent revisions of GB 4801.6-2016 National Food Safety Standard General for resins used to make Plastics in Contact with foodstuffs, GB 9685-2016 National Food Safety Standard for Uses of Additives in Food Contact Materials and Articles and GB 2760-2014 National Food Safety Standard for Uses of Food Additives. Further revisions will be evaluated upon request by TRTF at the time of publication of revisions

The information provided herein are 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 the here-above mentioned Product sold and supplied by TOTAL REFINING & CHEMICALS and do 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. TOTAL RESEARCH & TECHNOLOGY FELUY makes no warranties, express or implied, and assumes no liability in connection with any use of this information.

DISCLAIMER:

Our Statement of Compliance is only valid for as far as above-mentioned Product 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 Total 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 Statement of Compliance is valid for a period of 18 months starting from the date first above written and replaces any earlier Statement relating on this subject which should be considered as null and void. Upon the expiration of this Statement, we can issue a new one at your request. In case of change during this period a new Statement will be issued automatically; kindly forward it to any recipient of the present Statement.

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