

# LETTER OF COMPLIANCE

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### **Product TYPE:**

#### **Requesting Company Name:**

### CONTACT PERSON:

#### Date Issued:

All ViAm Films are produced for the requested physical properties of our customers and formulated for those intended purposes.

These statements do not cover: any modification of our product by any addition of any other product to it; any prejudicial modification of our product resulting from a processing of the product; or an inadequate use and/or storage of our material or the finished articles by the end user.

Consequently, this letter certifies that the above film types are produced by ViAm Films, a division of IBFC and complies with all Regulation requirements identified in this Letter of Compliance.

ViAm films should be placed in the processing area 24 hours prior to processing to acclimatize. ViAm films are largely unaffected by climatic conditions but should not be stored at temperatures above 100 deg F (38 deg C) and less than 32 deg F (0 deg C). Under suitable storage conditions the film can be stored for a period of six months without any risk of deterioration

I hope that this information is sufficient.

Yours truly,

Rhonda Morales Quality Assurance Manager Signed for/on behalf of ViAm Films, a division of IBFC Michele Fortin Quality Assurance Manager Signed for/on behalf of ViAm Films, a division of IBFC



Regulation	Requirement	Compliance
Federal Food, Drug,	9 CFR 317.24 Packaging materials.	YES
and Cosmetic Act	9 CFR 317 24.(b)	
	Packaging materials entering the official establishment must	
	be accompanied or covered by a guaranty, or statement of	
	assurance, from the packaging supplier under whose brand	
	name and firm name the material	
	is marketed to the official establishment. The guaranty shall	
	state that the material's intended use complies with the	
	FFDCA and all applicable food additive regulations. The	
	guaranty must identify the material, e.g., by the distinguishing	
	brand name or code designation appearing on the packaging	
	material shipping container; must specify the applicable	
	conditions of use, including temperature limits and any other	
	pertinent limits specified under the FFDCA and food additive	
	regulations; and must be signed by an authorized official of	
	the supplying firm. The guaranty may be limited to a specific	
	shipment of an article, in which case it may be part of or	
	attached to the invoice covering such shipment, or it may be	
	general and continuing, in which case, in its application to	
	any article or other shipment of an article, it shall be	
	considered to have been given at the date such article was	
	shipped by the person who gives the guaranty. Guaranties	
	consistent with the Food and Drug Administration's	
	regulations regarding such guaranties (21 CFR 7.12 and 7.13)	
	will be acceptable. The management of the establishment	
	must maintain a file containing guaranties for all food contact	
	packaging materials in the establishment. The file shall be	
	made available to Program inspectors or other Department	
	officials upon request. While in the official establishment, the	
	identity of all packaging materials must be traceable to the	
	applicable guaranty.	



FDA and European Union	<ul> <li>viAm does not analyze for substances not purposely added but we have reviewed the status of ViAm film products in relation to the chemicals identified in the following FDA and EU DIRECTIVES. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in ViAm film products.</li> <li>We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.</li> <li>21 CFR 177.1520 (c) (1.1) and (3.1): This regulation describes polypropylene and olefin copolymers that can be safely used in articles used for packaging or holding food at low temperatures and/or room temperatures.</li> <li>21 CFR 178.2010: This regulation lists antioxidants and/or stabilizers for polymers which may be safely used for the manufacture of articles which come into direct contact with food.</li> <li>21 CFR 176.170: This regulation lists antistatic and/or antifogging agents, which may be safely used for the manufacture of articles which code.</li> <li>21 CFR 176.170: This regulation has two tables for Raw and Processed Foods and Condition of use for Food Contact Substances. Providing that the metal surface of the metallized films are used as the inner sealable web in regular adhesive and/or poly-extrusion laminated structures for snacks, chocolate, confectionery and other food products where barrier requirements are critical would meet this regulation.</li> </ul>	ΥES
FDA and European Union continued	European Union Directives: 82/711/CEE - 93/8/CEE - 1935/2004/EC - 1895/2005/CE - 2002/72/CE ANNEXES I, II AND III and modifications included in 2004/19/EC - 2005/79/EC - 2007/19/EC - 2008/39/EC 2023/2006 EC - 94/62/EC - 85/572/EEC - 97/48EC, <u>Germany:</u> BgVV Recommendation VII- D.M. 21/3/73 and updating of 28/3/03 - D.M. 26/4/93 n° 220 - D.M. 15/6/00 n° 210	YES





REACH (EU # 1907/2006)	ViAm does not analyze for substances not purposely added but we have reviewed the status of ViAm film products in relation to the chemicals identified REACH regulations SVHC list. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in ViAm film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Information from the suppliers of additives used in our film products indicates that these substances are not intentionally added to their products. Please be advised ViAm does not use the ingredients identified on that list in the formulation or in the process to manufacture ViAm film products you purchase. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.	YES
Migratory Microwave Application	The U.S. Food and Drug Administration (FDA) has not issued any specific regulations on food packaging for microwave use. However, any package used in a food contact applications must be suitable for the intended use under FDA's good manufacturing practices (GMP) regulation found in Title 21 of the Code of Federal Regulations (CFR), Section 174.5 ("General provisions applicable to indirect food additives"). The context of cooking/reheat and temperature of extraction with different food stimulants is covered by CFR 176.170 and usage of polypropylene film is covered by CFR 177.1520. ViAm material complies with FDA 21 CFR 177.1520(c) (1.1) (c) 3.1a & (c) 3.2a including food cooking applications under conditions of use B, C, D, E and H described in Table 2 of 21 CFR 176.170 (c) and can be used with all food types listed in Table 1 of 21 CFR 176.170. If the film is in contact with fatty based foods it is possible to have superheating giving temperatures that can be above the melting point of the polypropylene film and non-compliance through breakdown (see 174.5).	YES



CEPA List of Challenge Substances Batch Numbers 1,2,3,4,5, 6,7,8, 9, 10, 11 and 12 Cobalt-containing substances Aromatic Azo-and Benzidine-Based substances Petroleum sector stream substances Domestic Substances List Inventory Update (DSL IU)	ViAm does not analyze for substances not purposely added but we have reviewed the status of ViAm film products in relation to the chemicals identified in the Canadian CEPA List. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in ViAm film products. We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Information from the suppliers of additives used in our film products indicates that these substances are not intentionally added to their products. Please be advised ViAm does not use the ingredients identified on that list in the formulation or in the process to manufacture ViAm film products you purchase. Based on this information, and knowledge of our process, we believe that these products do not contain the regulated substances.	YES
Azodicarbonamide	Azodicarbonamide, or azobisformamide, is an organic chemical, $\underline{C_2H_4O_2N_4}$ . It is a yellow to orange red, odorless, crystalline powder. It is known as <u>E number</u> E927.	Yes
	The principal use of Azodicarbonamide is in the production of foamed plastics. The thermal decomposition of azodicarbonamide results in the evolution of nitrogen, carbon monoxide, carbon dioxide, and ammonia gases which are trapped in the polymer as bubbles to form a foamed article. Common examples of this application are window and door gaskets, padded floor mats, gym/exercise mats, shoe soles etc	
European Commission Directives	ViAm herewith certifies that all polypropylene non-printed/non- coated films produced in the Morristown, TN and Lanoraie, QC facilities meet the requirements set forth in Directive 889/109/EC (1989), 90/128/EC (1990), 92/39/EC (1992), 93/9/EC (1993), 95/30EC (1995), 96/11/EC (1996), 1999/91/EC, EU 10/2011, EU and ED2009/251/EC Note:RoHS2011/65/EU will replace the current 2002/95/EC From the 1st of May 2011 until 31st of December 2012: the old testing regime applies. However the new testing regimes can be used by industry if	
	From 1st of January 2013 until 31st of December 2015: the supporting document can be based on one of the two testing regimes, old and new ones. After 1st of January 2016: Only new testing regime is applicable	







CONEG (Heavy Metals)	Total content of Cadmium, Chromium, Lead, and Mercury must be below 100ppm	YES
ALLERGENS	<ul> <li>All and any polypropylene packaging film products produced contain none of the below mentioned components nor are they based or derived from any known or potential food allergen such as, but not limited to:</li> <li>Peanuts</li> <li>Peanuts</li> <li>Sesame/poppy/caraway seeds</li> <li>Eggs or egg derivatives</li> <li>Dairy or dairy derivatives</li> <li>Corn or corn derivatives</li> <li>Cottonseed products</li> <li>Soy or soy derivatives</li> <li>Gluten from rye, oats, wheat and barley</li> <li>FD&amp;C/synthetic colors</li> <li>Sulfites</li> <li>Shellfish/fish</li> <li>Crustacean</li> <li>Monosodium glutamate (MSG) or MSG derivatives</li> <li>Celery</li> <li>Aspartame</li> </ul>	YES
BENZYL PHENOL	No benzyl phenol is contained in the films produced by ViAm. Benzyl phenol is crystalline substance with a melting point of 20.2-20.9°C, or a liquid; used as a germicide, preservative, and antiseptic.	Yes
Styrene	No styrene is contained in the films produced by ViAm.	YES
Acrylamide Content	ViAm does not use the ingredients identified as Acrylamide in the formulation or in the process to manufacture ViAm products you purchase. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in any products that are manufactured by ViAm.	YES
RoHS Directive	The substances banned under RoHS, lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (CrVI), polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) are not intentionally added in the manufacture of or formulation of Viam Films.	YES







3-Monochloropropane -

96-24-2.

1,2- diol (3-MCDP) CAS NO.

Dimethylfumarate (DMF)

Methylnaphthalene

(CAS# 98-83-9)

Alpha Methyl Styrene

Ozone Depletion Substance	ViAm hereby certifies that its BOPP plants do not intentionally use any of the ozone depleting substances listed under Class I and Class II of the 1990 Clean Air Act to manufacture any of our polyolefin films. The films, therefore, do not require labeling as set out in the rule of the Federal Register (57 FR 19166) of the 4th of May 1992. This certificate relates only to non-printed/non-coated polypropylene packaging films.	YES
NATURAL RUBBER LATEX	No Genetically Modified materials or Natural Rubber Latex.	YES
Chlorine Bleach	Use of Chorine bleach in clean up process or in product zones is not allowed.	YES
KOSHER Certified	ViAm is a plastic film manufacturing facility that has no type of foods or food type materials within the process or operation. To be certified by a Rabbi of the Jewish Faith is not considered applicable for this type of facility.	NO
Vinyl Acetate		
Vinyl Chloride Epoxidised Soy Bean Oil (ESBO) PVC	No Vinyl Acetate, Vinyl Chloride, ESBO or PVC is contained in the films produced by ViAm.	Yes
Antimicrobial additives	Microbes that contaminate packaging materials typically are controlled by using heat, steam, or radiation, or by the addition of antimicrobial additives. Packaging microbials are materials that can be added to packaging materials and will prevent microbial growth. Nor does it use or treated with fungicides, preservatives, or fumigants	ViAm does not utilize the use of Antimicrobial Additives in films.
Lead Content (lead in surface Coatings and or in Substrates Materials)	No Lead is contained in the films produced by ViAm.	Yes

No 3-Monochloropropane -1,2- diol is contained in the films

No Dimethylfumarate is contained in the films produced by ViAm.

No methylnaphthalene is contained in the films produced by ViAm.

No Alpha Methyl Styrene is contained in the films produced by

produced by ViAm.

ViAm.

YES

YES

YES

YES



Recyclables	BOPP film products are recyclable as per Industry standards and procedures.	YES
Recycled Content	Our films contain up to 25% internal recycled polypropylene. This recycled material originates from trim and transitional production and is reground and extruded into pellets. This recycled material is 100% internal recycle made from FDA food contact approved raw materials. It is not chemically modified in any way in the recycling process. There is no post-consumer recycle materials utilized in our film manufacturing process.	YES
HDODA 1,6 Hexanediol diacrylate	We do not use HDODA in our formulation or the process to manufacture ViAm film. We do not analyze for ingredients not purposely added but based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in the film.	YES
Australian Standard A2070-1999	Australian Standard A2070-1999, Plastics materials for food contact use, Section 4 "General Requirements for New Plastics Materials and Rework Materials" (Mar. 5, 1999, rec'd Oct. 17, 2000). "New plastics materials used in the manufacture of plastics items for food contact use shall comply with the following: (a) The relevant regulations in the United States of America Food and Drugs Administration as set out in the Code of Federal Regulations 21 C.F.R. Parts 170 to 199 and any subsequent amendments and revisions; (b) the relevant European Commission directives for materials and articles intended to come into contact with foodstuffs as set out by Commission Directives 89/109/EEC (Framework Directive) and 2002/72/EEC (Plastics Directive)."	YES
ITX Isopropylthioxanthone	No ITX Isopropylthioxanthone is contained in the films produced by ViAm	YES
Benzophenone         CASRN 119-61-9         4-methylbenzophenone         CASRN 134-84-9         2-HYDROXYBENZOPHENONE         CASRN 117-99-7	No benzophenone compounds are contained in the films produced by ViAm.	YES



Asbestos	No asbestos is contained in the films produced at ViAm.	YES
BHT, BHA, TBHQ Stearates, Starches	No food additives or preservatives are contained in the films produced at ViAm.	YES
Pesticides and Fungicides	No pesticides or fungicides are contained in the films produced at ViAm.	YES
Dioxins	No dioxins are contained in the films produced at ViAm. Dioxins are found throughout the world in the environment and they accumulate in the food chain, mainly in the fatty tissue of animals.	YES
MDI/MDA Plasticizers Substituted Diphenylamines	No MDI or MDA plasticizers are contained in the films produced at ViAm which include which include but not limited to the following chemicals: Benzene, 1,1'-methylenebis[4-isocyanato-, CAS RN 101-68-8 Benzenamine, 4,4'-methylenebis-, CAS RN 101-77-9 Benzene, 1,1'-methylenebis[2-isocyanato-, CAS RN 5/2/2536 2536-05-2 Benzene, 1-isocyanato-2-[(4-isocyanatophenyl)methyl]-, CAS RN 5873- 54-1 Isocyanic acid, polymethylenepolyphenylene ester, CAS RN 9016-87-9 Benzene, 1,1'-methylenebis[isocyanato-, CAS RN 26447-40-5 No substituted diphenylamines are contained in the films produced at ViAm which include but not limited to the following chemicals: Benzenamine, 4-octyl-N-(4-octylphenyl)-, CAS RN 101-67-7 Benzenamine, 4-(1-methyl-1-phenylethyl)-N-[4-(1-methyl-1- phenylethyl)phenyl]-, CAS RN 10081-67-1 3. Benzenamine, ar-octyl-N- (octylphenyl)-, CAS RN 26603-23-6 Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene, CAS RN 68411-46-1 Benzenamine, N-phenyl-, styrenated, CAS RN 68442-68-2	YES
Jatropha Plant	ViAm does not use any ingredients derived from the Jatropha plant in the formulation or in the process to manufacture ViAm products. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in any products that are manufactured by ViAm.	YES
Model Toxics in Packaging Legislation (1998 revision)	ViAm does not analyze for substances not purposely added but we have reviewed the status of ViAm film products in relation to the substances outlined in the list. Based on the raw material certifications and the fact that those ingredients are not intentionally added, they are not expected to be found in ViAm film products.	YES
TNPP	ViAM does not intentionally add the chemical TNPP (Trisnonylphenylphosphite) to our products. Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added, they are not expected to be found in ViAm film products.	YES



Perchlorate and long-chain Perfluorocarboxylates	ViAM does not intentionally add the chemical Perchlorate and long- chain perfluorocarboxylates (PFCs) to our products Based on our knowledge of the raw materials and the fact that those ingredients are not intentionally added they are not expected to be found in ViAm film products.	YES
Dodd Frank Wall Street Reform and Consumer Protection Act-Section 1502	ViAm does not analyze for substances not purposely added and we have reviewed the status of ViAm film products in relation to the Dodd-Frank Act section 1502. Based on our knowledge of the raw materials and the fact that these minerals are not intentionally added, they are not expected to be found in ViAm film products.	YES
	We do exercise good product stewardship and seek information concerning additive composition from our suppliers. Based on this information, and knowledge of our process, we believe that our products do not contain conflict minerals	

## Substance List:

Substance, Identifying Code application	CAS#
PP	9003-07-0