PRODUCT REGULATORY COMPLIANCE STATEMENT

HB0972

Issuance Date: 31 August 2025

HIGH DENSITY POLYETHYLENE

Product Manufacturer

This product is manufactured by Lotte Chemical Titan (M) Sdn Bhd.

REACH (Regulation (EC) No. 1907/2006) and amendments (June 2025)

Substances of Very High Concern (SVHC)

This product is not intentionally added with any candidate substances (250 substances, 25 June 2025) proposed to be Substances of Very High Concern above the 0.1% threshold as stated in REACH (Article 57, Regulation (EC) No. 1907/2006).

This product is also not intentionally added with any substances on the REACH Annex XVII Restriction Substances list (77 valid entries, 28 July 2025).

This product is also not intentionally added with any substances on the REACH Annex XIV Authorisation List (59 substances).

REACH registration

Polymers are generally exempted from the provisions on registration of Title II of REACH (Article 2(9)). However the ethylene and propylene monomers have to be registered. For further enquiries, please contact our Technical Service Department.

Food Contact

US Food and Drug Administration (FDA)

This product, as manufactured, is in compliance with Title 21 (Edition 2021), Code of Federal Regulations (CFR) Parts 177.1520 (a) (3) (i) (a) (1) and (c) 3.1a & 3.2a as promulgated by the US Food and Drug Administration (FDA) for all food types listed in Table 1 and under conditions of use B through G as described in table 2 of CFR 21 176.170 (C).

European Union (EU) Food Contact – Regulation 1935/2004/EC and (EU) No. 10/2011 and amendments, most recent amendment No. 2025/351 (March 2025)

This product complies with the relevant requirements of Regulation 1935/2004/EC (Framework Regulation), applicable to plastic raw material.

This product complies with the relevant requirements of Regulation 2023/2006/EC (Good Manufacturing Practice), applicable to plastic raw material. Lotte Chemical Titan maintains an ISO 9001 system that corresponds to the requirements of EC No 2023/2006 and adopts good manufacturing practice.

The monomers and additives used to produce this product are listed in the Union List of Authorized Substances of Regulation 10/2011/EC.

This product is not intentionally added with any substance with Specific Migration Limits (SMLs). However aluminium (CAS No. 7429-90-5), may exist as a functional component of the co-catalyst system, triethyl aluminium (CAS No. 97-93-8). The total Al content is expected to be below the SML limit (1mg/kg).

This product contains Calcium Stearate (E470a) as dual use additive, which is permitted as food additives or flavourings in Regulation 1333/2008/EC or Regulation 1334/2008/EC.

China National Standard of Food Safety – GB4806.1-2016, GB4806.7-2023 and GB9685-2016 (No.1 Amendment Sheet)

This product complies with the relevant requirements of GB4806.1-2016: General Safety Requirements for Food-Contact Materials and Articles and GB4806.7-2023* Plastic Materials and Products for Food Contact, listed in Table A1 with unrestricted requirements.

*In-house lab test

The monomers and additives used to produce this product are listed in GB9685-2016: Standard for The Use of Additives for Food Contact Materials and Articles and control well below the maximum allowable limit.

This product contains one or more substances with Specific Migration Limits (SMLs). As the fabrication process can affect the migration behavior, the fabricator of the articles is responsible to test and determine the migration limit of the final articles intended to come into contact with foodstuffs.

Japan Food Sanitation Law (Law number: Act No. 233 of 1947)

This product is listed in the Positive List of Polymer of Japan Food Sanitation Act (November 2023). The monomers and additives used to produce this product are listed and control below Use Level listed in Positive List of Monomers and Additives of Japan Food Sanitation Act.

Malaysia Food Regulation 1985

The manufacture of this product complies with the relevant requirements of Malaysia Food Regulation 1985 Part VI Packages For Food, applicable to packages raw material.

As the fabrication process can affect the migration behavior, the fabricator of the articles is responsible to test and determine the migration limit of the final articles intended to come into contact with foodstuffs.

Indonesia Food Contact (BPOM)

This product is in compliance with the Badan Pengawas Obat dan Makanan (BPOM) Regulation 20/2019 on Food Packaging (Appendix I: Food contact substances prohibited for use in food packaging and Appendix II: Food contact substances permitted for use in food packaging with migration limit).

This product is not intentionally added with any food contact substances in food packaging with Specific Migration Limits (SMLs).

Heavy Metals

No heavy metals (i.e. antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium) are intentionally added to this product in quantities that would violate government guidelines. The summation of Lead, Mercury, Cadmium and hexavalent chromium in this product is less than 20ppm. Polybrominated biphenyls (PBB) ,Polybrominated diphenyl ether (PBDE) ,Hexabromocyclododecane and Phthalates are not intentionally added to this product. This product therefore meets the relevant requirements of the following Directives or Regulations:

- Restriction of Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) – EU Directive 2011/65/EC and amendments (January 2025)
- Coalition of Northeastern Governors (CONEG) Model Toxics in Packaging
- Packaging and Packaging Waste 94/62/EC and amendment (May 2018)
- Waste Electrical and Electronic Equipment (WEEE) – EU Directive 2002/96/EC and 2012/19/EU
- End of Life Vehicles (ELV) – EU Directive 2000/53/EC

Regulation (EC) NO.1895/2005

The manufacture of this product does not involve intentional addition of Bisphenol A (BPA), diglycidyl-ether (BADGE), Bisphenol F diglycidyl ether (BFDGE) and Novolac glycidyl ethers (NOGE).

California Proposition 65 (1986)

The manufacture of this product does not involve intentional addition of any of the substances listed in California's Proposition 65 chemicals listing (3 January 2025).

Halogenated Flame Retardants

This product is not intentionally manufactured with halogenated or phosphorous based flame retardants.

Ozone Depleting Chemicals (ODCs)

This product is not intentionally manufactured with Class I and Class II ODCs listed in the US Clean Air Act Amendments of 1990.

Animal Derived Material/BSE/TSE

This product is not intentionally manufactured with animal fats, oils, milk products or other animal- or tallow-derived products.

Carcinogenic/Mutagenic/Reprotoxic Substances

This product is not intentionally manufactured with carcinogenic 1A/1B, mutagenic 1A/1B or reprotoxic 1A/1B (CMR) substances, in accordance with the classification rules of Regulation (EC) No 1272/2008 (CLP) Annex VI.

Global Automotive Declaration Substance List (February 2025)

The manufacture of this product does not involve intentional addition of any prohibited substances or declarable substances above the threshold limit of 0.1%.

Toys

EN 71-3:2019+A2:2024, EU Directive 2009/48/EC
The manufacture of this product does not involve intentional addition of allergenic fragrances, aluminium, antimony, arsenic, barium, boron, cadmium, chromium (III), chromium (VI), cobalt, copper, lead, manganese, mercury, nickel, selenium, strontium, tin, organic tin and zinc. However, aluminium is a functional component of the co-catalyst system, triethyl aluminium.

EN71-9:2005
The manufacture of this product does not involve intentional addition of chemicals listed in Tables 2D, 2E and 2I

Standard Consumer Safety Specification for Toy Safety ASTM F963
The manufacture of this product does not involve intentional addition of Di(2-ethylhexyl) phthalate, nitrosamines, lead, antimony, arsenic, barium, cadmium, chromium, mercury, selenium.

Food Allergens

The manufacture of this product does not involve intentional addition of food allergens as listed in:
- US Allergen Labelling and Consumer Protection Act of 2004. 21 note – FALCPA and
- EU Regulation No 1169/2011 (25 October 2011) Annex II.

EU Directive 2006/122/EC

The manufacture of this product does not involve addition of perfluoroctanoic acid (PFOA), perfluoro-alkyl sulphonates (PFAS) and perfluorooctane sulfonate (PFOS).

Conflict Minerals

The manufacture of this product does not involve intentional addition of tin, tantalum, tungsten, gold and minerals associated with these metals (Columbite-Tantalite, Cassiterite, Gold, Wolframite)

Nanomaterial

This product is not a nanomaterial.

Persistent Organic Pollutants

This product is not intentionally manufactured with chemical substances as listed in Regulation (EU) 2019/1021 and amendments.

Global Chemical Inventory Compliance

All ingredients of this product are listed in the following chemical inventory lists or exempt:

Country	Inventory	Y/N	Country	Inventory	Y/N
United States	TSCA	Yes	Japan	ENCS	Yes
Euro	EINECS	Yes	Korea	KECL	Yes
Canada	DSL	Yes	New Zealand	NZIoC	Yes
Australia	AICS	Yes	Philippines	PICCS	Yes
China	IECSC	Yes	Taiwan	TCSI	Yes

Other Chemical Substances

The following chemical substances are not intentionally added into the product during its manufacture:

No.	Substance name	No.	Substance name
1.	Adipates	30.	Nano Materials
2.	Amide /Amines and Aromatic Amines	31.	Nitrosamines
3.	Azo compounds	32.	Nitrosatable Substance
4.	Benzene	33.	N-Ethy-toluenesulfonamide (ortho/para)
5.	Biocide/Pesticide	34.	Nonylphenol
6.	Blowing agent	35.	Octyl- or Nonylphenols or -phenolethoxylates;
7.	Brominated & Chlorinated substances	36.	Organic tin compounds/Alkyltin compounds
8.	Chlorophenols	37.	O-alkyl (C<=10,Incl. Cycloalkyl) (Me,Et,n-Pr or I-Pr)-phosphonofluoridates
9.	Chlorinated aromatic hydrocarbons	38.	O-alkyl (C<=10,incl. Cyclically)N,N-dialkyl (Me,Et,n-Pr or I-Pr) phosphoramidocyanidates
10.	Chlorinated plastic, Polyvinyl chloride (PVC) & its blends, Polyvinylidene chloride & its blends	39.	O-alkyl (C<=10,incl. Cycloalkyl) S-2-dialkyl (Me,Et,n-Pr or I-Pr) -aminoethyl alkyl (Me,Et,n-Pr,IPr) phosphonothiolate and its alkylated or protonated salts
11.	Dioxins	40.	S-2-dialkyl (Me,Et, n-Pr or I-Pr)-aminoethyl= hydrogen= alkyl(Me,Et,n-Pr,I-Pr) phosphonothiolate and its alkylated or protonated salts
12.	Ditertbutyl peroxide	41.	O-alkyl (C<=10 ,incl. cycloalkyl) O-2-dialkyl (Me, Et, n-Pr or i-Pr) -aminoethyl alkyl (Me, Et, n-Pr or I-Pr) phosphonites and its alkylated or protonated salts
13.	Enamel	42.	O-2-dialkyletyl (Me, Et, n-Pr or i-Pr) = hydrogen = alkyl (Me, Et, n- Pr or i-Pr) phosphonites and its alkylated or protonated salts
14.	Epoxy derivatives	43.	Optical Brighteners
15.	Ethylene Glycol Ethers	44.	Perfluorinated Chemicals
16.	Flame retardant	45.	Phenols
17.	Fragrances	46.	Phthalates
18.	Genetic Modified Organism	47.	Polybrominated Biphenyls
19.	Isocyanates	48.	Polybrominated Diphenyl Ethers
20.	Halogen (Cl, Br, F)	49.	Polychlorinated Naphthalenes
21.	Halogenated Phenols	50.	Polychlorinated and polybrominated Biphenyls
22.	Hydrofluorocarbon, Perfluorocarbon	51.	Polychlorinated and polybrominated Terphenyls
23.	Long-chained chlorinated paraffins	52.	Polycyclic aromatic hydrocarbons
24.	Medium-chained chlorinated paraffins	53.	Quartz
25.	Melamine and derivatives	54.	Radioactive substances
26.	Microbial	55.	Recycled materials
27.	Mineral Oil Aromatic Hydrocarbons	56.	Silicone / Siloxane
28.	Mineral Oil Saturated Hydrocarbons	57.	Shortchain Chlorinated Paraffins
29.	Natural rubber or latex	58.	Softeners

Additional information on the health and safety aspects of our product is listed in the SDS of the product. Please contact our Technical Service Department for any other technical enquiry and clarification.

The information supplied here is valid for 1 year from the date of issuance and will be updated when appropriate or changes are made in any of the regulatory requirements. User is advised to revisit to check for any update.

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