

Styrolution Group GmbH · Erlenstraße 2 · D-60325 Frankfurt am Main

F.A.O. Rabbit J Investments Limited

12 October 2015
SC /9831

Subject: Regulatory status of Styrolution product Luran SAN C 552485

Dear Customer,

This letter is in response to your request regarding the above product.

We hereby declare that regarding the composition of the product manufactured and identified as:

Luran® SAN C 552485

the basic polymer chemically consists of styrene acrylonitrile copolymer and complies with the relevant aspects of the following food contact regulations on materials and articles :

EU (European Union)

Commission Regulation (EU) No 10/2011 as amended^{1,2}, Annex I (Union list of authorised substances). If present, the monomers and additives being subject to restrictions or specifications are mentioned below.

Abbreviations used below:

OML = Overall Migration Limit of surface area of material or article [mg/dm²] or in food simulant [mg/kg];

SML = Specific Migration Limit in food or in food simulant [mg/kg].

¹ Commission Regulation (EU) No 10/2011 replaces Directive 2002/72/EC and its amendments on May 1st, 2011.

² Amendments of Regulation (EU) No 10/2011: Regulations (EU) No 321/2011, No 1282/2011, No 1183/2012, No. 202/2014 and No. 865/2014.

The information above refers to the state of the laws at the date of issue. This confirmation expires after 12 months or in case of regulatory changes. Please ask for a new confirmation if needed. It is the responsibility of those to whom we supply our products to ensure that any proprietary rights and existing laws and legislation are observed. The statement provided is exclusively for our customers and respective competent authorities. It is not intended for publication either in printed or electronic form (e.g. via Internet) by others. Thus, neither partial nor full publication is allowed without written permission.

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FCM No. = Unique identification number of the substance

ND = Non-detectable, a detection limit of 0,01 mg/kg food is applicable unless specified differently.

Finished products fabricated with the above product must comply with the following restrictions when placed on the market in any of the EU Member States or in non-EU countries which have adopted the same legislation:

OML: 10 mg/dm² or 60 mg/kg food (Article 12).

SML : acrylonitrile (CAS No. 107-13-1; FCM-No. 225): ND

Depending on the processing conditions, there may be a variation of the residual content of acrylonitrile in the finished article. Therefore the specific migration limit of acrylonitrile as well as the global migration have to be especially monitored.

The product is suitable for repeated use applications (multiple short time contact with food only) but not intended for single use applications like food packaging.

Regulation (EC) No 1935/2004, Article 3

We declare that the composition of the above product complies with the relevant requirements of Article 3 of the above Regulation, provided the end-use restrictions are met under normal conditions of use.

Regulation (EC) No 1935/2004, Article 17

Concerning the traceability of the used raw materials we can state that there is a system in place which enables the control of the material stream in our production and to trace the materials back to our upstream suppliers.

Good Manufacturing Practice 2023/2006

With regards to compliance with the provisions given in Commission Regulation (EC) No 2023/2006 there are systems in place which control and document as required for Food Contact Good Manufacturing Practice.

For notice: Appropriate processing conditions for the articles have to be applied. The suitability of the articles for the application concerned, including their effect on smell and taste of the food, and observance of any given limitations (for example overall migration, specific limits and other analytical requirements) must be tested and ensured in each case by the person who introduces the articles into circulation.

FDA Statement

Please be advised that Luran SAN C 552485 is in compliance with the U.S. Food and Drug Administration's Federal Food Drug and Cosmetic Act and all applicable food additive regulations. Specifically, it is in compliance with regulation 21 CFR 181.32 (acrylonitrile copolymers and resins) for use in repeated-use food-contact applications, subject to the limitations of this regulation and any other applicable regulations.

It is, however, the responsibility of the final manufacturer to determine that the finished food-contact article meets the limitations for acrylonitrile monomer extraction as set forth in 21 CFR 181.32(b) of the Food Additive Regulations.

Please note that this declaration is only valid for prime products manufactured within the Asia Pacific Region. This declaration does not apply to products manufactured in India.

If you have further questions, contact your local sales representative or send an E-Mail to: infopoint.asia@styrolution.com.

Best regards

Styrolution Group GmbH

This document is valid without signature.