

Palram Industries Regulatory Data Sheet

Update: May 2025

Regulatory Compliance Overview

Palram Industries Ltd. is committed to ensuring that our products meet the highest standards of applicable environmental and chemical safety regulations. This document provides a comprehensive overview of our compliance with various international regulations. Each regulation is addressed in a separate paragraph, detailing our compliance status.

The following regulations are covered in this document:

- Animal derivatives
- BPA
- EUDR
- MCCPs
- Microplastics
- PFAS
- Phthalates
- POPs
- REACH – SVHC Candidate List
- REACH Annex XIV
- REACH Annex XVII
- RMI
- RoHS
- TSCA

Animal derivatives

Most of the raw materials used in the manufacture of our products are animal derivatives-free.

As informed by our suppliers, all animal-derived raw materials have been chemically altered from their original structure during the manufacturing process, and therefore disease transmitters have been inactivated.

BPA (Bisphenol A)

Palram ensures that our products comply with BPA regulations under TSCA Section 6(h) and the REACH regulation. Our products do not contain BPA above the regulatory limits.

European Regulation on Deforestation Free-Products (EUDR)

The European Union has adopted the EU Deforestation Regulation (Regulation (EU) 2023/1115) to reduce the EU's contribution to global deforestation and forest degradation.

This regulation requires companies to ensure that certain raw materials and products, such as soy, palm oil, cattle, coffee, cocoa, rubber and timber, placed on the EU market have not been produced on land deforested after 31 December 2020. Originally, the regulation was supposed to apply from 30 December 2024, but the transition period was extended by one year, so that it now applies from 30 December 2025 for large companies and from 30 June 2026 for micro and small enterprises. Our products comply with the EUDR regulation.

MCCPs (Medium-Chain Chlorinated Paraffins)

Palram's products comply with REACH Annex XVII and TSCA which regulate the use of MCCPs. We ensure that our products do not contain MCCPs above the regulatory limits.

Microplastics - REACH Annex XVII Entry 78

On 25 September 2023, the European Commission introduced a sales ban on microplastics in a wide range of products. Microplastics are defined as synthetic polymer particles below five millimeters.

Manufacturers and downstream users of synthetic polymer microparticles in the form of powders, pellets and flakes used as feedstock in plastic article manufacturing at industrial sites are exempt from the ban.

Palram is not responsible for wrong use/treatment/disposal of solid packaging.

It is the Customer's duty to dispose of packaging material properly and in accordance with local regulations to prevent environmental contamination. Detailed information can be found in the PSDS.

PFAS (Per- and polyfluoroalkyl substances)

PFAS are not intentionally used in the manufacturing process of Palram sheets. Therefore, they are not expected to be present in our products above ubiquitous* levels.

*With respect to a chemical substance, the word "ubiquitous" means that this substance is naturally present in the environment and could at least be detectable as traces everywhere. Traces of such "ubiquitous" chemicals cannot be prevented, neither through technical nor physical or physical-chemical measures. The analytical determination of all these ubiquitous substances is not part of the process monitoring at PALRAM nor part of PALRAM's delivery specifications.

Phthalates

Our products comply with the REACH Annexes (XIV and XVII) and US Consumer Product Safety Improvement Act (CPSIA) Section 108, which regulate the use of phthalates in consumer products. We ensure that our products do not contain phthalates above the specified limits.

Persistent Organic Pollutants (POPs)

We can confirm that our products do not contain any chemicals listed in Annex I of Regulation (EU) 2019/1021.

REACH– SVHC Candidate List

Palram's products are defined as "Articles" with no intended substance release from the polymeric matrix under normal and reasonably foreseeable conditions of use. Therefore, to the best of our knowledge, substances contained in our products are exempt from registration obligation (Art. 7.1).

We are proactive in monitoring the SVHC Candidate List, which is regularly updated following Article 59(1) of REACH. Based on the latest information from our suppliers, our products do not intentionally contain any listed SVHCs (January 2025 update) in concentrations equal to or greater than 0.1% (weight by weight). The presence of analytically detectable traces, which have possibly been introduced via raw materials, auxiliaries and additives, cannot be excluded. Specific analyses to measure such traces have not been performed.

REACH - Annex XIV Authorization List

Annex XIV of the REACH Regulation lists Substances of Very High Concern (SVHCs) that require authorization before they can be used or placed on the market within the EU. Our products do not contain any substances listed on the Authorization list.

REACH - Annex XVII Restriction List

Annex XVII of the REACH Regulation is known as the Restriction List. It contains a list of substances, mixtures, or articles whose manufacture, placing on the market, or use is limited or prohibited within the European Union due to unacceptable risks to human health or the environment. Restrictions can apply to specific uses, concentration thresholds, or even complete bans, and they are legally binding.

Our products do not contain any restricted substance for use in plastic sheets or above applicable concentration thresholds.

RMI (Responsible Minerals Initiative)

Palram Industries Ltd. declares compliance with the Responsible Minerals Initiative (RMI). This ensures that our supply chain adheres to the ethical sourcing of minerals, addressing both the social and environmental impacts of mineral extraction and sourcing practices globally. This compliance is in line with the US Dodd-Frank Act and the EU Conflict Minerals Regulation (EU) 2017/821.

RoHS (Restriction of Hazardous Substances Directive)

Palram's products comply with the RoHS Directive (EU) 2011/65, as amended by Directive (EU) 2024/232. We ensure that no substances listed in Annex II are present above the specified limits.

TSCA (Toxic Substances Control Act)

Our products comply with the TSCA regulation, including Title VI Part 770 and Section 6(h) for Persistent, Bioaccumulative, and Toxic (PBT) Chemicals.

Disclaimer:

The information contained in this Regulatory Data Sheet applies to products produced by Palram at the time of the publication hereof. The variety of regulations and regulatory regimes listed may not be relevant to specific Palram products. Palram Industries Ltd., to the best of its knowledge, believes that the information provided above is accurate and correct, based on the sources available at the time of writing. The company is a manufacturer of articles, and its regulatory statements are based on and reliant upon the declarations of its raw material suppliers. Due to the scope of regulations, the rapid changes in regulatory requirements, and the large number of suppliers, the company conducts a regulatory review with its suppliers annually and publishes this document once a year. This document supersedes all versions prior to the effective date. However, Palram does not assume liability for the use of this information or for any claims or damages from any third party.

This document does not cover certain complementary products, accessories, or externally sourced components that may be included in broader product offerings. For regulatory information on such items, please contact us directly.

For further details and inquiries regarding regulatory matters, or any specific product, please contact us at: Regulations@palram.com

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