



# Palram Industries Ltd Regulatory Data Sheet

Update: November, 2024

## 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:

- REACH (EC)
- Microplastics
- Phthalates
- TSCA
- BPA
- MCCPs
- RoHS
- PFAS
- RMI (CMRT/EMRT)

## REACH (EC) – 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 2024 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.





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Update: November, 2024

## 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.

## 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.

## 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.

## 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.

## 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.

## 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.





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## 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.*

## RMI (Responsible Minerals Initiative)

Palram Industries Ltd declares compliance with the Responsible Minerals Initiative (RMI), which covers both the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT). 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.

## 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.

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