

# ESHQ – PRODUCT STEWARDSHIP



## Allergens

There are no sources of allergens (e.g., peanuts, milk, eggs) in the feedstock that we use nor do we add these allergens to our process. Therefore, we believe that our products do not contain any allergens.

## Animal and Plant Origins

Our Carbon Blacks do not contain any materials from animal or plant origins. Therefore, we believe that our products comply with EMEA/410/01 (Minimizing the Risk of Transmitting Animal Spongiform Encephalopathy Agents).

## Bisphenol A

There are no sources of bisphenol A in the feedstock that we use nor do we add this chemical to our process. Therefore, we believe that our products do not contain any bisphenol A.

## California Proposition 65 Regulation

Carbon Black is subject to this regulation only if it is airborne, unbound particles of respirable size.

## Canada Worker Hazardous Material Information System (WHMIS)

Carbon Black falls under Classification D2A of this regulation.

## Chemical Inventories

Carbon Black (CAS number 1333-86-4) appears on the following inventories:

- AICS (Australia)
- DSL (Canada)
- IECSC (China)
- EINECS (Europe)
- ECL (Korea)
- NZIoC (New Zealand)
- ENCS (Japan)
- PICCS (Philippines)
- CSNN (Taiwan)
- TSCA (United States)

## Coalition of Northeastern Governors (CONEG) Regulation

This regulation requires the sum of lead, mercury, cadmium, and hexavalent chromium to be less than 100 ppm. We believe that our products meet this regulation because past lab analyses showed that our products were well below this limit. Individual Analysis depending on grade and application on request.

## Conflict Minerals

Our Carbon Black grades do not contain any of the conflict minerals such as tin, tungsten, and gold as outlined in Section 1502 of the Dodd-Frank Act.

## **EN 71 Requirements**

This regulation requires the concentration of each individual heavy metal to be less than 10 ppm. Individual Analysis depending on grade and application on request.

## **EU Directive 94/62/EC**

The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium in our Carbon Black, used for packaging or packaging components, does not exceed 100 ppm by weight.

## **EU Directive 2002/16/EC**

There are no sources of 2,2-bis (4-hydroxyphenyl) propane bis (2,3-epoxypropyl) ether („BADGE“), bis (hydroxyphenyl) methane bis(2,3-epoxypropyl) ethers („BFDGE“) and novolac glycidyl ethers („NOGE“) in the feedstock that we use nor do we add these chemicals to our process. Therefore, we believe that our products do not contain these chemicals.

## **EU Directive 2002/61/EC**

There are no sources of azodyes in the feedstock that we use nor do we add these chemicals to our process. Therefore, we believe that our products do not contain these chemicals.

## **EU Directive 2003/89/EC**

Carbon Black does not contain any constituent that would be considered to be an allergen present in foodstuffs (e.g., cow's milk, peanuts, eggs).

## **EU Regulation 10/2011**

We have special Carbon Blacks, which are in accordance. Individual report on each lot of Carbon Black.

## **PAH Content**

Polycyclic aromatic hydrocarbons are found in our products. Individual Analysis depending on grade and application on request.

## **Phthalate Content**

There are no sources of phthalate in the feedstock that we use nor do we add this chemical to our process. Therefore, we believe that our products do not contain any phthalate.

## **REACH Regulation and Substances of Very High Concern (SVHC)**

Our Carbon Blacks are registered under REACH. We have reviewed ECHA's SVHC list, and we believe that our products do not contain any of the SVHCs because there are no known sources of these chemicals in the feedstock or in the process. Individual Analysis of PAH and Heavy Metals depending on grade and application on request.

<https://echa.europa.eu/de/candidate-list-table>

## **Restriction of the use of Hazardous Substances (RoHS) regulation (Directive 2002/95/EC and 2003/11/EC)**

This regulation requires the concentration of the following hazardous substances be less than 1000 ppm (lead, mercury, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers, pentabromodiphenyl ether, and octabromodiphenyl ether) and the concentration of cadmium be less than 100 ppm. Individual Analysis of PAH and Heavy Metals depending on grade and application on request.

### **Switzerland Ordinance on Materials and Articles (SR 817.023.21)**

Carbon Black is listed in Annex 6 of approved substances in this regulation.

### **UN Transport of Dangerous Goods**

Carbon Black is not ADR. Rather a flammable solid, or classifiable as self-heating substance as defined by UN Recommendations on the Transport of Dangerous Goods and the International Maritime Dangerous Goods Code. Commercial Carbon Black is not classified as a hazardous material by the following agencies:

- Brazilian Ministry of Transport – GEIPOT
- Canadian Transport of Dangerous Goods Regulations – TDG
- European Transport of Dangerous Goods Regulations by RAIL – RID, by Road – ADR or on the Rhine – ADNR
- International Air Transport Association (IATA) United Nations (no UN number)
- U.S. Department of Transportation Hazardous Materials Regulation DOT, GGVS and GGVE

### **United States Food and Drug Administration**

Upon Request.

### **United States SARA Title III 311/312**

Carbon Black is subject to SARA Title III 311/312 reporting.

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