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The new restriction aims to reduce emission of intentionally added microplastics from products such as cosmetics, household and industrial detergents, cleaning products or granular infill for use on synthetic sports surfaces. It covers all synthetic polymer particles below five millimeters (mm) that are organic, insoluble and resistant to (bio)degradation.

Manufacturers and industrial downstream users of synthetic polymer microparticles in the form of pellets, flakes, and powders used as feedstock in plastic manufacturing at industrial sites are exempt from the sales ban as stated in paragraph 4(a) of the annex to the regulation. Meanwhile, the loss of plastic pellets represents an important industrial source of microplastics in the environment. According to the regulation, manufacturers should (1) provide instructions with respect to use and disposal to industrial downstream users from October 17, 2025 onwards, and (2) fulfill reporting obligations to authorities related to pellet loss to the environment from May 31, 2026 onwards. The plastic pellet supply chain, that SABIC is part of, is already putting in place voluntarily initiatives (including reporting) to minimize pellet loss.

SABIC is committed to implementing Responsible Care® and global sustainability programs (such as The Alliance to End Plastic Waste, Operation Clean Sweep®, etc.) throughout the value chain that are designed to prevent and address accidental releases of plastic pellets into the environment. Accordingly, SABIC recommends implementation of systems and practices by downstream users to prevent and address incidental releases in order to protect the aquatic environment from potential (long-term) negative effects of plastic materials. Please note that Safety Data Sheets as supplied by SABIC already provide instructions for use and disposal explaining how to prevent releases to the environment.

Phthalates / Endocrine Disruptors / CMR substances / Cosmetics Regulation / EuPIA Exclusion Policy

We can inform you that this SABIC Product contains residual traces of a phthalate at a concentration level below 2 ppm [$<0.0002\%(w/w)$]. It originates from the catalyst system used in the manufacturing process.

The used phthalate is allowed as a *“technical support agent in polyolefins in concentrations up to 500 ppm [0.05 % (w/w)] in the final product”* according to Commission Regulation (EU) 10/2011 on materials and articles intended to contact food. The residual phthalate traces fully comply with the applicable requirements listed in that regulation and in Directive 2005/84/EC on phthalates in toys and childcare articles (repealed by EU Regulation (EC) No 1907/2006; see item 51 of Annex XVII).

These residual phthalate traces are not subject to authorization and Annex XIV (Authorisation List) of EU Regulation (EC) No 1907/2006 incl. amendments (see Status of SABIC Product with respect to REACH Registration / SVHC / ANNEX XIV / ANNEX XVII).

According to the recipe in the production, the SABIC Product does not contain substances listed by the following lists or regulations, except for above-mentioned residual traces of a phthalate:

- Substances listed in the Endocrine Disruptor Lists I, II and III (www.edlists.org; latest update November 2023). That also covers substances referred to in item I and II of Article L. 5232-5 of the Public Health Code, France.

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Please note that these lists include the dithiocarbamate based fungicide 'Mancozeb' (CASRN 8018-01-7) and 'Cholecalciferol' (Vitamin D3; CAS 67-97-0).

- Substances classified as CMR (all categories) according to the Regulation (EC) 1272/2008 on the classification, labelling and packaging of substances and mixtures and its amendments, excluding authorised substances as referred to in Articles 5 and 6 of EU Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, and its amendments.
- “Substances prohibited in cosmetic products” as listed in Annex II or “Substances which cosmetic products must not contain except subject to the restrictions laid down” as listed in Annex III of EU Regulation (EC) No 1223/2009/EC on cosmetic products including amendments up to and including Commission Regulation (EU) 2023/1545 of 26 July 2023.
- Substances (Group A – G) as listed in the EuPIA Exclusion Policy for printing inks and related products, 6th Edition of March 2024.

California Proposition 65

According to the recipe in the production of the SABIC Product, the following substance(s) as such is / are not intentionally added:

- Substances (at levels resulting in exceedance of indicated safe harbor levels) mentioned in the list of chemicals known to cause cancer or reproductive toxicity (Safe Drinking Water and Toxic Enforcement Act of 1986) of the California Proposition 65, updated December 29, 2023.

According to the recipe in the production, the trace residuals of a phthalate originating from the catalyst system used in the polymerization process do not exceed indicated safe harbor levels.

Animal origin, TSE/BSE, Kosher/Halal

According to the recipe in the production of the SABIC Product, the following substances as such are not intentionally added:

- alcohol

The absence has not been checked by tests.

It has to be recognized that the SABIC Product is not produced in an exclusive "Halal or Kosher Certified" surrounding.

We have to inform you that according to the recipe in the production of the SABIC Product, substances of bovine origin are used.

Our suppliers have informed us that in line with Commission Regulation (EU) No. 142/2011 of 25 February 2011 implementing Regulation (EC) No. 1069/2009, the sourced fats are coming from BSE free countries or are obtained exclusively from class 3 animal by-products.

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During the production process, the fats undergo:

- a hydrogenation process at temperature above 220° C for at least 120 minutes at more than 15 bars
- a hydrolysis or hydrolytic reaction at a temperature above 200° C for at least 120 minutes at 20 bars.

It is the opinion of our suppliers that their process fully exceeds the conditions recommended by:

- Note for guidance on minimising the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products (EMA/410/01 rev. 3)
- CPMP (Committee for Proprietary Medical Products) in guideline BWP/5136/03 of 21 October 2004 and amendments
- Scientific Committee on Cosmetology of 24 June 1997 and the conditions mentioned in Annex VI chapter III of Regulation (EC) No. 1774/2002
- Annex II of Commission Directive 2000/6/EC of 24 January 2000

Based on this information there is no reason for SABIC to take action or to switch its source of supply, unless it is requested to do so by authorities in order to guarantee absence of animal-based derivatives in the additives used.

Per- and PolyFluorinated Alkyl Substances (PFAS)

Per- and Polyfluorinated Substances (hereinafter “PFAS” ¹) are a chemical class with diverse molecular structures and physical, chemical and biological properties. The term PFAS is a broad, general, non-specific term that does not inform whether a substance, which fits into this chemical class, is harmful or not ².

There are currently no global absolute bans on PFAS, but a comprehensive package of strategies on taking broad-scale regulations or restrictions worldwide to regulate PFAS is currently under development.

This SABIC Product does not contain intentionally added PFAS. According to the formulation in the production of the SABIC Product, the following substances as such are not intentionally used or added:

- Per- and PolyFluorinated Alkyl Substances (PFAS) including, but not limited to:
 - Per- and PolyFluorinated Carboxylic Acids (PFCA) and their derivatives (e.g. Long Chain PerFluorinated Alkyl Carboxylates (LCPFAC) and their salts and precursors, TFA, PFPA, HFBA, PFHxA, PFOA, PFNA and “GenX substances”)
 - Per- and PolyFluorinated Sulfonic Acids (PFSA) and their derivatives (e.g. PFBS, PFHxS, PFOS, PFOSA)
 - PerFluoroEther Carboxylic Acids (PFECA) and their derivatives
 - PerFluoroEther Sulfonic Acids (PFESA) and their derivatives

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- PerFluoroAlkyl Phosphonic or Phosphinic Acids (PFPhA, PFPiA) and their derivatives
- Fluorinated polymers (e.g. PTFE, FEP, PVDF, PVF)
- PerFluoroPolyEthers (PFPE)

¹ [About PFASs - OECD Portal on Per and Poly Fluorinated Chemicals](#)

² <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf>

PPW / ELV / RoHS / WEEE / CONEG

The chemical composition of the SABIC Product complies with:

- EU Directive **94/62/EC** of 20 December 1994 on packaging and packaging waste (**PPW**), up to and including EU Directive (EU) 2018/852 of 30 May 2018.
- EU Directive **2000/53/EC** of 18 September 2000 on end-of life vehicles (**ELV**), up to and including Commission Delegated Directive (EU) 2023/544 of 18 September 2023.
- EU Directive **2002/95/EC** of 27 January 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (**RoHS 1**), recast by European Directive **2011/65/EU** (**RoHS 2**), amended by European Directive (EU) **2015/863** of 31 March 2015 (**RoHS 2 amendment**), up to and including Commission Delegated Directive (EU) 2023/1437 of 4 May 2023.
- China Standard GB/T 26572-2011, “Requirements of concentration limits for certain restricted substances in electrical and electronic products.” issued by China’s Ministry of Industry and Information Technology (MIIT).

Since the SABIC Product does not contain brominated flame-retardants, this material is not subject to the selective waste requirements of Annex VII of Directive **2012/19/EU** of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (**WEEE**) and amendments.

With respect to heavy metals (Cadmium, Mercury, Lead and hexavalent Chromium), the chemical composition of the SABIC Product complies with:

- EU Directive **94/62/EC** of 20 December 1994 on packaging and packaging waste (**PPW**), up to and including EU Directive (EU) 2018/852 of 30 May 2018.
- EU Directive **2000/53/EC** of 18 September 2000 on end-of life vehicles (**ELV**), up to and including Commission Delegated Directive (EU) 2023/544 of 18 September 2023.
- Coalition of Northeastern Governors (**CONEG**) developed “**Model Toxics in Packaging Legislation**”.

The SABIC Product is not classified as “hazardous mixture” according to EU Regulation (EC) 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP), and amendments.

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Both naming options are depicted in tables 1 and 2 below:

Suffix	Feedstock origin
C	Mixed Plastic Waste
CO	Ocean Bound Plastic
B	Crude Tall Oil
BU	Used Cooking Oil
BV	Vegetable Oil Processing Residues

Table 1. Product identification via suffixes

Indicator	Feedstock origin
TRUCIRCLE™ Circular MPW	Mixed Plastic Waste
TRUCIRCLE™ Circular OBP	Ocean Bound Plastic
TRUCIRCLE™ Renewable CTO	Crude Tall Oil
TRUCIRCLE™ Renewable PFAD	Vegetable oil processing residues
TRUCIRCLE™ Renewable UCO	Used Cooking Oil

Table 2. Product identification via indicators

Example: STAMAX™ 40YM240 - in all colours (TRUCIRCLE™ Renewable UCO) is a TRUCIRCLE™ certified renewable version of fossil feedstock based STAMAX™ 40YM240 - in all colours.

The content of this document equally applies to the TRUCIRCLE™ certified circular and renewable variants of fossil feedstock-based STAMAX™ 40YM240 - in all colours.

- Additional supply sources may be added in the future.
- Product naming options may differ between product portfolios and may be subject to change. Customers will be informed accordingly.

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