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Declaration of Compliance with Food Safety Regulations

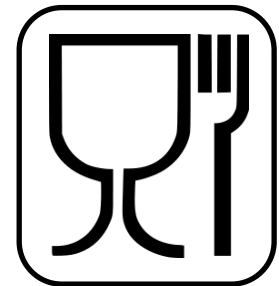
Date of declaration: September 2, 2015

Clearway hereby declares that the supplied semi-finished products:

Standard REF100 Low Temp REF428 Stop-Bac REF459

are designed for use in food production facilities, and these products:

- comply with the requirements of Federal Code of Regulations Title 21 (21 CFR 177.1010, 21 CFR 178.2010, 21 CFR 178.3790 and 21 CFR 178.3297), of the Food and Drug Administration (FDA)
- comply with the relevant requirements of the United States Department of Agriculture (USDA)
- comply with the relevant requirements of Secretaría de Agricultura, Ganadería, Desarrollo Rural, Pesca y Alimentación (SAGARPA) – Norma Oficial Mexicana NOM-008-ZOO-1994
- are approved by the Canadian Food Inspection Agency (CFIA) for use in food facilities, based on letter of acceptance after testing and analysis performed by the CFIA.



Compliance with specific migration limits

The above-mentioned product was manufactured exclusively with the authorized substances (polymer, pigments and additives) specified in the aforementioned regulations. The composition and individual SML (specific migration limits) of all the ingredients used in the semi-finished product have been controlled carefully in laboratory tests to ensure safety.

Conditions of use

The product is suitable for repeated use applications only and is not intended for single use applications such as food packaging. These products are designed for incidental food contact and not continuous contact with food.



Responsibility on the part of the Purchaser

As a semi-finished product, it is the purchaser's responsibility to verify the suitability of the plastic material components made for or from our products for the intended use in the food preparation area:

- whether the physical characteristics of the plastic material are appropriate for the intended food,
- possible influence of the material on the chemical characteristics of the food,
- the need for appropriate cleaning of the produced work pieces prior to the first contact with food,
- to note in writing the complete restrictions of use related to the intended application to the user.

It is the purchaser's responsibility to ensure traceability of the material during any subsequent use up to and including the finish machined part as well as the equipment in which it is assembled.



Validity of the declaration:

This declaration of compliance relates exclusively to the product specified herein in the condition in which it was placed on the market. Any additional components, handling operations or modifications carried out subsequently are expressly excluded. The present declaration ceases to be valid in the event that the use of the product is not in compliance with local regulations or with the declaration by AmCraft Manufacturing.



Why is Non-Phthalate plasticizer in soft vinyl?

Soft Vinyl is a complex material. Softness or flexibility is given by plasticizers' within the basic formulas.

Phthalates have been used for many years and are still present today in the manufacturing process around the world. Phthalates over the years have received some negative comments concerning the impact on human health and the environment. These comments have been subject of a lot of studies and contradictory regulations.

In order to escape the controversy regarding phthalates', **EXTRUFLEX** has developed a completely innovative **NON-PHTHALATE SOFT VINYL RANGE**.

Already used in children's toys, medical industry and in food contact material and devices. **EXTRUFLEX'S** unique **NON-PHTHALATE** plasticizer will provide for the first time a guarantee to all uses that it's the safest soft vinyl products on the current market.

Our label "**NON-PHTHALATE**" will give you assurance that our soft vinyl is no longer using phthalates and will offer you the best choice and peace of mind for our health and protecting the environment.



Risk assessment conclusions published in the Official Journals of the European Union 2006/C 90/04

RISK ASSESSMENT Conclusion of the assessment on the risks to		PHTHALATE		NON PHTHALATE	
		DEHP	DINP		
HUMAN HEALTH	WORKERS	X	✓	✓	
	CONSUMERS*	X	✓	✓	
	HUMANS EXPOSED VIA THE ENVIRONMENT	X	✓	✓	
	HUMAN HEALTH (physico-chemical properties)	✓	✓	✓	
	FOOD CONTACT	Aqueous preparation*	X	✓	✓
		Acidic liquid*	X	✓	
Alcohol beverage*		X	✓		
Fatty food*		X	X		
TOYS AND CHILDCARE ARTICLE		X	X	✓	
ENVIRONMENT	ATMOSPHERE	✓	✓	✓	
	AQUATIC ECOSYSTEM	X	✓	✓	
	TERRESTRIAL ECOSYSTEM	X	✓	✓	
	MICRO-ORGANISMS IN THE SEWAGE TREATMENT PLANT	✓	✓	✓	
CONCLUSION		Repr. Cat2 R60-61	Restricted use	SAFE	

✓ : SAFE X : Risk for human health or environment

* migration of the plasticizer shall not exceed the maximum level authorized by regulation
 DINP cannot be used in toys and childcare articles which can be placed in mouth.
 Use of DEHP is unauthorized in all toys and childcare articles.



Dear Customer,

As you probably know the image of flexible as well as rigid polyVinyl chloride (PVC) has been strongly depreciated for the last 30 years.

Unfortunately for its disparagers, polyvinyl is today the second polymer used all around the world. It is the one which has been the most studied and therefore of which all the effects on human beings has been totally delimited:

In a first step polyvinylchloride has been attacked as polymer: All negative arguments have been, one after the other, completely refuted.

In a second step attacks have been aimed at phthalates which are, among other plasticizers, giving the flexibility to polyvinylchloride.

The chemical phthalates family is wide and the controversy has focused on ortho-phthalates (DOP, DEHP, DINP, DIDP, DIUP). One of them, DOP/DEHP, has been proved as repro-toxic. It was banned in certain applications (baby toys, food applications...)

The ban on DOP/DEHP has overflowed on the image of other ortho-phthalates.

Despite the fact that they are completely safe and used in a lot of applications they are still drawing suspicion and controversy.

To escape from controversies and follow a safe and sure scientific way, Extruflex, which is both a producer and a converter of flexible vinyl, had decided three years ago to give up with ortho-phthalates and to use only non-ortho-phthalate plasticizer in the composition of our flexible vinyl. In the past year all of our customers have been delivered with strips and sheets which are non-phthalate flexible vinyl based.

Today, in order to allow you to achieve some differentiation from your competitors we are pleased to tell you that all our rolls will be labeled with a "NON-PHTHALATE" sticker.

Follow us, inform your customers of the difference and give them the opportunity to race ahead for human being safety and high standard products.

