INEOS
Olefins & Polymers
USA

TUB121B
Polyethylene Copolymer
CAS #: 25213-02-9

Regulatory Position Statement

INEOS O&P USA RESPONDS TO PRODUCT STEWARDSHIPS REQUESTS WITH A STANDARDIZED REGULATORY POSITION STATEMENT (RPS) WHICH SUMMARIZES THE GLOBAL REGULATORY STATUS OF THE ABOVE-MENTIONED PRODUCT. PLEASE NOTE THAT COMPLIANCE WITH THESE REGULATIONS SHOULD NOT BE INTERPRETED TO GUARANTEE THAT THE PRODUCT, WILL, IN FACT, PERFORM IN A PARTICULAR APPLICATION. YOUR TECHNICAL SERVICE REPRESENTATIVE CAN HELP YOU DETERMINE THAT THE CHARACTERISTICS OF THE PRODUCT ARE COMPATIBLE WITH THE DESIRED CONDITIONS OF USE.

International Standards

For information relating to compliance with NSF International or CSA International standards, please visit the corresponding website(s) at www.nsf.org or www.csagroup.org, or send an email to your INEOS Sales or Technical Service Representative.

United States FDA Compliance – Title 21 Code of Federal Regulations (CFR)

Regarding the compliance status of the product referenced above with the regulation(s) identified below the following can be declared, as applicable to plastic intermediate materials:

This product is not suitable for use in food contact products.

GMP, FSMA, and EC Commission Reg. (EU) No 2023/2006

INEOS O&P USA maintains an ISO 9001:2015 quality management system that corresponds to the requirements of FSMA and EC No 2023/2006 and addresses good manufacturing practice (GMP) for materials intended to come into contact with food. US FDA regulations do not specifically require food contact material manufacturers to be GMP certified.

This product complies with the relevant requirements of Regulation 2023/2006/EC (GMP) and as amended, applicable to intermediate materials (e.g., plastic powders, plastic granules, or plastic flakes).

A copy of the current certificate is available online by following the link provided here: ISO CERTIFICATE

Halal, Kosher Status

This grade has not received Halal or Kosher certification. However, we can hereby confirm that no animal fats, oils, milk products or other animal- or tallow-derived products are used as components of, or in the manufacture of, this product.

Allergens

None of the substances listed as causing allergies or intolerances in the following legislations or standards are intentionally added to this grade or expected to be present:

- Annex II of Regulation (EU) 1169/2011
- Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA)
- China food safety standard GB 7718-2011
- Brazil Anvisa RDC 727/2022

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Allergens and/or their derivatives from such things as pigments, fragrances, artificial sweeteners (e.g. aspartame), corn, tree nuts (e.g. almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios or walnuts); peanuts, lupins, soy/soybeans, peas, carmine/cochineal, milk, lecithin, eggs, fish (e.g. bass, flounder, cod), crustacea shellfish (e.g. crab, lobster, or shrimp), molluscs, celery, sesame or sesame seeds, mustard or mustard seeds, diacetyl, glutamites, glutamic acid, sulphur dioxide, MSG or hydrolysed vegetable proteins, nitrites or sulphites, or gluten from the grains of the following cereals: barley; oats; rye; triticale; or wheat.

Genetically Modified Organisms (GMO)

Because of the multitude of crop sources used, our suppliers of plant-based additives are unable to certify that their products are 100% GMO-free.

Global Inventory Status

The base polymer of this product is a Polyethylene Copolymer with CAS number 25213-02-9. For information on the components of our product and their concentration, please refer to the Safety Data Sheet (SDS) and the Technical Data Sheet (TDS). Any hazardous constituents above regulatory disclosure cut-off limits determined according to their regional and/or specific GHS classification(s) will appear in the ingredients section of the SDS.

Country	Inventory	Status
United States of America	EPA Toxic Substance Control Act: TSCA – Active Substance List	Y
Canada	Domestic Substances List: DSL or Non-Domestic Substance List: NDSL	Y
Australia	Australian Inventory of Industrial Chemicals: AIIC	Y
European Union	European Inventory of Existing Commercial Chemical Substances: EINECS	Y
Japan	Japan Inventory of Existing & New Chemical Substances: METI/ENCS	Y
South Korea	Korea Existing Chemicals Inventory: KECI	Y
China	Chinese List on New Chemical Substances: IECSC	Y
Philippines	Philippines Inventory of Chemicals and Chemical Substances: PICCS	Y
New Zealand	New Zealand Inventory of Chemicals: NZIoC	Y
Taiwan	Taiwan Chemical Substance Inventory: TCSI	Y

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EU REACH

Please refer to our INEOS REACH Statement online covering applicable REACH registration under Technical Information or by following the link provided here: INEOS REACH Statement.

This grade is compliant with CLP Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, as amended. A Safety Data Sheet can be downloaded here: Product SDS.

On February 4, 2026, the European Chemicals Agency (ECHA) added two new substances to the Candidate List of Substances for eventual inclusion on the Annex XIV List of Substances subject to Authorisation; bringing the total number of Substances of Very High Concern (SVHC) on the List to 253. The full Candidate List of SVHC for Authorisation can be found here: SVHC List.

This product is not manufactured or formulated with any of the SVHC or Annex XIV substances on the Authorisation list that would require reporting, if present above the 0.1% threshold, as stated in REACH (Article 57, Reg. No. 1907/2006).

Recycling

The recycling code shown to the right applies to the resin only. It may not apply to products manufactured from this resin. Recycling codes for finished articles must be determined by the manufacturer on a case-by-case basis.



Regulations Applicable to End-Use Articles

Cosmetics

Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products, applies to cosmetics products and their ingredients as defined by the Article 1 of this regulation.

This polymer does not intentionally add substances listed in in Annex II or III of the Cosmetics Regulation 1223/2009, as amended up to Regulation 2019/1966, which may be present at levels above 10 ppm.

Safety of Toys

Directive 2009/48/EC on the safety of toys, as amended to Commission directive (EU) 2019/1922, includes safety requirements the toys need to comply with to be placed on the market and not specifically to intermediate plastic materials.

This product conforms to the substance limits and/or prohibition requirements of the following:

- Consumer Product Safety Improvement Act (CPSIA) of 2008/Lead and Phthalates in Toys
- EU Safety of Toys EN 71-3: 2019+A1:2021

Contact us:
Customer Service: 1-800-527-5419
Technical Service: 1-800-338-0489
www.ineos-op.com
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Other Regulations

This product is in compliance with the relevant requirements of the following regulations:

BADGE/NOGE - EU Commission Regulation (EC) No 1895/2005

This Regulation does not apply to our product because our products are not manufactured with any of the following substances:

- 2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether, hereinafter referred to as 'BADGE' (CAS No 001675-54-3), and some of its derivatives;
- bis(hydroxyphenyl)methane bis(2,3-epoxypropyl)ethers, hereinafter referred to as 'BFDGE' (CAS No 039817-09-9);
- other novolac glycidyl ethers, hereinafter referred to as 'NOGE'.

CA Prop 65 - Safe Drinking Water and Toxic Enforcement Act of 1986, as amended.

No substance listed on California's Proposition 65 chemicals listing, known to the State of California to cause cancer or reproductive toxicity, is intentionally added in the manufacture of this product. It remains the responsibility of the final article's producer to ensure compliance and reporting according to California Proposition 65 requirements.

Canadian Environmental Protection Act (CEPA, 1999)

The List of Toxic Substances in Schedule 1 of the Canadian Environmental Protection Act, 1999 (CEPA) includes substances that are considered to be toxic as defined in Section 64 of the Act. None of the chemicals on WHMIS, Canada's Prohibition of Certain Toxic Substances list or the Canadian Chemical Management Plan are intentionally added as raw materials to this product.

Japan Chemical Substance Control Law (CSCL)

None of the chemicals on CSCL: Class I or II Specified Chemical Substances, ISHA Chemical Substances Prohibited or Requiring Permission for Manufacturing, or Japan Poisonous and Deleterious Substances Control Act are intentionally added as raw materials to this product.

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Microplastics - Commission Regulation (EU) 2023/2055

INEOS intermediate plastic raw materials are supplied in the form of pellets or powder and fall under the definition of synthetic polymer microparticles. However, according to point 4(a) of this Restriction, this shall not apply to the placing on the market of synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites. Suppliers of synthetic polymer microparticles have to report various information to ECHA including (but not only) identity of the substance, quantities, etc., and we confirm that INEOS has set up the necessary processes to fully comply with these requirements. Some intentionally added raw materials or additives also falling under the definition of synthetic polymer microparticles might be used in the manufacture of our grades. However, we confirm that the derogation under point 4(a) mentioned above also applies to them. Additionally, these raw materials and additives will be incorporated into this grade during the manufacturing process in a way that their microparticle structure will not be maintained. In this respect, we consider that synthetic polymer microparticles are no more present in this grade as dispatched from our plant.

Metals

US CONEG – "Toxics in Packaging Clearinghouse"

The regulated metals – lead, mercury, cadmium, and hexavalent chromium – are not intentionally added during the manufacturing process. Testing for heavy metals – cadmium, chromium, lead and mercury – resulted in a total for all metals detected of < 2 ppm, compared to the CONEG requirement of < 100 ppm. The result for incidental lead concentration was less than the detection limit of 0.1 ppm.

EU Packaging and Packaging Waste Regulation (PPWR) – Regulation (EU) 2025/40

This resin contains no intentionally added lead, cadmium, mercury, or hexavalent chromium, and incidental metals are < 2 ppm, which is below the 100 ppm limit. This product is not formulated with substances of very high concern (SVHC) above 0.1% w/w in accordance with REACH Article 33. Compliance with PPWR requirements applicable to packaging must be assessed by the manufacturer of the final article.

Restriction of Hazardous Substances in Electric and Electronic Equipment (RoHS)

Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment, as amended, including Commission Delegated Directive (EU) 2015/863 of 31 March 2015 also known as RoHS 3.

Nanomaterials

This intermediate plastic raw material as supplied as well as all substances used in its manufacture do not fall under the definition of "nanomaterial" as provided in the Commission Recommendation on the definition of nanomaterial 2022/C 229/01 (updating Commission Recommendation 2011/696/EU).

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Waste

Waste Electrical and Electronic Equipment (WEEE)

Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment, as amended.

End of Life Vehicles

Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles, as amended.

Substances of Concern to Our Customers

Based on knowledge of our raw materials and information from our suppliers, we can state that none of the substances of concern to our customers listed in the table below are intentionally added to this product.

We do not conduct routine analytical testing for the presence of these substances in our products and we cannot guarantee that there are no trace amounts of these substances, as impurity or otherwise, in this product.

Absence of Substances and Chemicals	
▪ 1,4-Dioxane	▪ Acrylamide
▪ 3-MCPD (3-monochloropropane)	▪ Alkyphenols and Ethoxylates: Octylphenol and Nonylphenol ethoxylates

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Absence of Substances and Chemicals

- Allergens or allergen derivatives
- Animal or Human Derived Material/TSE/BSE[1]
- Antimicrobial agents/ Biocides/ Fungicides/ Pesticides (*Substances identified as such and used for such purpose*)[2]
- Aromatic Amines
- Asbestos
- Azo dyes/ Colorants/Pigments
- Azodicarbonamide or semi-carbazide compounds
- Benzophenones, hydroxybenzophenone and 4-methyl benzophenone
- Benzoate Preservatives (e.g., BHA, BHT, TBHQ)
- Bisphenols (e.g., A, AF, AP, B, BP, C, E, F, FL, G, M, P, PH, S, TMC, Z)
- Bromine or Bromine Compounds
- Carboxymethylcellulose
- Chlorinated paraffins (Short Chain (SCCPs), Medium Chain (MCCPs), and Long Chain (LCCPs))
- Chlorine or Chlorinated Compounds
- Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC)
- CITES Appendix (I, II, III)
- Cobalt or Cobalt Compounds
- Cocamide diethanolamide
- Conflict Minerals: columbite-tantalite, coltan, niobium, tantalum, cassiterite (tin), gold, and wolframite (tungsten)[4]
- Decabromodiphenyl ether (Deca)
- Diethanolamine salts of mono- and bis
- Dimethyl Fumarate (DMF)
- Dioxins and furans
- Endocrine Disruptors[3]
- Epoxidized Soybean Oil (ESBO)
- Flame Retardants (e.g., Brominated, Halogenated, Phosphorous- or Nitrogen-based, Chlorinated, etc.)
- Formaldehyde
- Fragrances
- GADSL, “Global Automotive Declarable Substance List,” as amended, listed as Declarable or Prohibited above 0.1% wt.
- Halogens (e.g., fluorine, chlorine, bromine, iodine, astatine) or Halogenated Compounds containing these elements
- Hazardous Air Pollutants (HAPs) Section 112(b) of the US Clean Air Act
- Heavy Metals (e.g., As, Ba, Cd, Cr, Hg, Ni, Pb, Sb, Se)
- International Council for Harmonisation (ICH) Q3D Elemental Impurities
- “Intelligent packaging” materials
- IUCN Red List of Threatened Species
- Jatropha Oil
- Latex or Natural Rubber
- Melamine and cyanuric acid

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Absence of Substances and Chemicals

- Methylisothiazolinone (MI / MIT) & Methylchloroisothiazolinone (MCI / CMIT)
- Microbeads
- Mineral Oils – MOAH or MOSH[6]
- Nanoparticles
- N-Ethyl-toluenesulfonamide (Ortho/Para)
- Nickel or Nickel compounds
- Nitrates
- Nitrocellulose
- Nitrosamines
- Organotin Compounds, such as tributyl tin, trimethyl tin oxide, triphenyl tin, and trialkyl tin
- Ozone Depleting Chemicals (ODCs)[7]
- Polycyclic Aromatic Hydrocarbons (PAHs)
- Parabens
- Pentanoic acid
- Perchlorates
- Perfluoroalkyl substituted phosphate ester acids
- Per- and Polyfluorinated compounds (PFAS), including their acid, salts and pre-cursors such as PFCs, PFAs and PFASs, PFNs, PFOs and PFOA and PFCAs[8]
- Persistent, Bioaccumulative, and Toxic (PBT) Chemicals Under EPA TSCA Section 6(h)
- Triclosan (2,4,4' –trichloro-2'-hydroxy-diphenyl ether)
- Persistent Organic Pollutants (POPs) as listed in Regulation (EU) 2019/1021 Annex I-IV, including all amendments up to (EU) 2024/2570, amending EC No 850/2004 & Annexes A, B, & C of Stockholm Convention
- Phthalates (e.g., BBP, BDP, DBP, DCP, DEHP, DEP, DiBP, DiDP, DiNP, DMP, DnHP, DnOP, DiiHP)[5]
- Photoinitiators (e.g., 2-Isopropylthioxantone (ITX))
- Polysorbate 80
- Polybrominated compounds (e.g., PBBs, PBDEs, and PBTs)
- Polyhalogenated Organo Compounds (e.g., PCBs, PCTs, PCNs, and Ugilec)
- Primary Aromatic Amines (PAAs)
- Recycled or Reused Material (as defined in Art. 1 paragraph 3. Of Regulation (EU) 2022/1616
- Red List (Living Future Bldg. Materials List)
- Radioactive Substances
- REACH Annexes XIV and XVII
- Silica
- Silicone
- Solvents
- State Lists (e.g., Chemicals of Concern, including Maine, Massachusetts, Minnesota, Oregon, Vermont, Washington)
- Styrene
- Thiuram Mix
- Titanium Acetyl Acetonate (TAA)
- Tris (Nonylphenyl) phosphite (TNPP)

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Absence of Substances and Chemicals

- Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC)

Classification and Labelling Information

Classification and labelling information according to latest legislation requirements can be found in the Safety Data Sheets (SDS) for relevant product / country combinations and can be found here: Product SDS

For further information, please visit our website www.ineos-op.com.

As agent for INEOS O&P USA,



The information contained herein relates only to the specific product and/or material designated and may not be valid for such product and/or material used in combination with any other product and/or material or in any process, unless otherwise specified. This information in no way modifies, amends, enlarges, or creates any specification or warranty, and ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, ARE HEREBY EXCLUDED. The representations herein expressed are neither intended nor shall be construed as a definitive or comprehensive statement of all constituents sought. INEOS Olefins & Polymers USA shall not be responsible for any damage or injury resulting from abnormal use, from any failure to follow appropriate practices, or from hazards inherent in the nature of the product and/or material, nor for toxicological effects or Industrial Hygiene associated with particular use of any product described herein. Recipient hereby acknowledges and accepts its responsibility to determine and ensure all conditions, specifications, and regulatory requirements are met and the products fabricated from the specific product and/or material designated are acceptable for use in the intended application.

[1] No animal fats, oils, milk products or other animal- or tallow-derived products are intentionally used as components of, or in the manufacture of, this product.

[2] Biocidal Products (as defined in art.3 of Regulation (EU) No 528/2012 of 22 May 2012 as amended, specifically as any substance or mixture, in the form in which it is supplied to the user, consisting of, containing, or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action") are not used in the manufacture of or formulation of this product. The above product is not listed in the Annex "Active Substances Approved for Use in Plant Protection Products (i.e., fungicides, insecticides, plant growth regulators, rooting hormones, preserving plant products, herbicides, weed killers ...) of the Commission Regulation No 540/2011 implementing Regulation (EC) No 1107/2009 as regards the list of approved active substances - Amendments - Commission implementing Regulation (EU) 2018/1915 of 6 December 2018.

[3] None of the substances intentionally used in the manufacture of this grade are listed as having Endocrine Disrupting properties under Lists I, II and III of Endocrine Disruptors List on https://edlists.org/the-ed-lists and under the Candidate List of substances of very high concern for Authorisation as published under REACH Regulation (EC) 1907/2006.

[4] INEOS O&P USA (INEOS O&P) is not a publicly traded company so is not subject to the SEC reporting requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

[5] No phthalates (e.g., DEHP, DIDP, DINP, DMP, DIDP, BBP, DNOP, DBP, DEP) are intentionally added nor used as additives or raw materials in the manufacture of this product.

[6] Mineral Oils are not intentionally used as raw materials or additives in the manufacture of this grade. MOSH (Mineral Oil Saturated Hydrocarbons) and MOAH (Mineral Oil Aromatic Hydrocarbons) are not intentionally added as raw materials or additives. MOAH are not expected to be present. However, we cannot confirm the absence of MOSH as they represent a chromatographic fraction of hydrocarbons which could come from other sources, including but not exclusively oligomers, also known as POSH (Polyolefin Oligomeric Saturated Hydrocarbons). POSH are an intrinsic part of polyolefins and the result of the polymerization process. They can present hydrocarbon fractions similar to MOSH depending on the analytical technique used. It has been demonstrated that consumer exposure to oligomers from polyolefins food packaging under typical conditions of use is not a safety concern to human health.

[7] Materials listed in the Clean Air Act Amendments of 1990 (Class I, CFCs and Class II, HCFCs, Halons and the solvents, carbon tetrachloride and 1,1,1-trichloroethane) and ozone-depleting substances (ODS), listed in the Annexes I & II of the Regulation (EU) 2024/590 of 7 February 2024, are not intentionally used in the production of this product.

[8] PFAS as defined by OECD (2021), Reconciling Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance, OECD Series on Risk Management, No. 61, OECD Publishing, Paris.

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