

2020-09-22 No. S/20-237

**DECLARATION OF COMPLIANCE FOR A PLASTIC INTERMEDIATE MATERIAL¹ NEOPET
POLYMER – POLYETHYLENE TEREPHTHALATE (PET)**

NEO GROUP is a producer of plastic intermediate materials – Polyethylene terephthalate (PET) in granular form. The trade name is NEOPET (grades: AQUA NEOPET 76, NEOPET 78, NEOPET 80, NEOPET 82, NEOPET 84, NEOPET 82 FR and NEOPET 84 FR, NEOPET 82FR PLUS, NEOPET 84FR PLUS and NEOPET 82 HF). Production process in our company complies with Regulation (EC) No 2023/2006² standards on Good Manufacturing Practices for Materials and Articles intended to come into contact with food.

Monomers and Starting Substances

NEO GROUP confirms that NEOPET is manufactured only with monomers and other starting substances and additives that are authorised under the Plastics Regulation³ No 10/2011.

Intentionally Added Substances

NEO GROUP confirms that intentionally added substances in NEOPET, not subject to listing in the Union List comply with the relevant requirements of the Framework Regulation⁴ (EC) No 1935/2004 and that a risk assessment in accordance with Article 19 of the Plastics Regulation No 10/2011 has been performed.

No further risk assessment by any downstream operator is required for substances intentionally added by NEO GROUP.

NEO GROUP reminds processors of NEO GROUP plastics intermediate material that if they add any substances (i.e. colorants, processing aids, and effect additives) they must declare these in their Declaration of Compliance to their customers.

Non-Intentionally Added Substances

- 1) NEO GROUP PET is sold for use as a plastic's intermediate material.
- 2) The Committee of PET Manufacturers in Europe (CPME, <http://www.cpme-pet.org/>), of which NEO GROUP is a member, has commissioned from an independent laboratory extensive analysis of the reaction intermediates, decomposition or reaction products commonly referred to as "Non-Intentionally Added Substances" (NIAS) of all PET manufactured by its members including PET manufactured by NEO GROUP.
- 3) Following the analysis commissioned by CPME, NEO GROUP can confirm that NIAS comply with the relevant requirements of the Framework Regulation and that a risk assessment in accordance with Article 19 of the Plastics Regulation No 10/2011 has been performed.
- 4) NEO GROUP can confirm that no further NIAS risk assessments on PET sold as a plastics intermediate material will have to be performed by the downstream processor.

¹ Union Guidance on Regulation (EU) No 10/2011 with subsequent amendments on plastic materials and articles intended to come into contact with food as regards information in the supply chain, 28.11.2013 - Section 4.3.1 pp. 20 to 32

² Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food with subsequent amendments

³ REGULATION (EU) No 10/2011 with subsequent amendments on plastic materials and articles intended to come into contact with food

⁴ REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC

- 5) Depending on processing conditions for NEOPET you may create more NIAS and therefore you must carry out your own NIAS analysis and then perform a risk assessment as laid down in Article 19 of Plastic Regulation No 10/2011.
- 6) NEO GROUP can confirm that details of the CPME NIAS analysis and risk assessment processes are retained by CPME for inspection by a Competent Authority as Supporting Documentation.
- 7) Information on how to carry out a PET NIAS analysis and risk assessment can be obtained by contacting CPME at info@cpme-pet.org.

Substances that are Subject to Restrictions in National Legislation

NEO GROUP does use colour modification agents and these are listed in the French Positive list (or Council of Europe (COE) Resolution AP (89) 1). This information is retained for inspection by a Competent Authority as Supporting Documentation.

Migration of Substances Subject to Restrictions in National Legislation

NEO GROUP confirms that the substances mentioned in section above (*Substances that are subject to restrictions in national legislation*) do not migrate in detectable concentrations.

Specific Migration Limits

Intentionally added substances used in the manufacture of Polyethylene terephthalate (PET) subject to Specific Migration Limits:

Substances	PM/Ref. No	CAS No	Specific migration limits (SML)
Terephthalic Acid (PTA)	24910	000100-21-0	7.5 mg/kg
Isophthalic Acid (IPA)	19150	000121-91-5	5 mg/kg
Monoethylene Glycol (MEG)	16990	000107-21-1	30 mg/kg of MEG+DEG
Diethylene Glycol (DEG)	15760	000111-46-6	
Antimony Trioxide	35760	0001309-64-4	0.04 mg/kg of Antimony

Metals

NEOPET does not intentionally contain substances listed in point 1 of Annex II of the Regulation No 10/2011.

Primary Aromatic Amines (PAAs)

NEOPET does not release PAAs covered by point 2 of Annex II of the Regulation No 10/2011. In the CPME industry test programme for NIAS no PAAs were found.

Further Compliance Work Required by Customers

There will be a need for further steps of compliance work to be performed by the downstream operator.

PET generates NIAS at all stages when processed from a plastics Intermediate material to a final article. This generation is controlled only by the processor particularly if additives such as colours, antioxidants, processing aids, recycled PET etc. are added. Downstream users are required by legislation to carry out their own risk assessment on any NIAS generated as a result of processing NEOPET from its granular form to an article.

Information on Dual Use Additives

NEO GROUP can confirm that it uses a phosphorus compound in the manufacture of NEOPET. The compound is listed in Table 6 of Section 7 of Commission Regulation (EU) No 1130/2011 of 11 November 2011 amending Annex III to Regulation (EC) No 1333/2008 of the European Parliament and of the Council on food additives by establishing a Union list of food additives approved for use

in food additives, food enzymes, food flavourings and nutrients and therefore it is a dual use additive⁵.

Column 10 Restrictions

NEOPET FR (fast reheat) grades contain Carbon Black FCM No 411 and this substance complies with the restrictions and specifications laid out in Column 10 of Annex 1 of Commission Regulation (EU) No 10/2011 on Plastics Materials and Articles Intended to come into Contact with Food.

Food Contact Uses

NEO GROUP PET is fully food contact compliant as sold and can be used for many food contact applications, however NEO GROUP is not in a position to make a specific statement about any food contact applications as NEOPET must be further processed in order to make an article.

Carcinogenic, Mutagenic, Reprotoxic (CMR) Substances

NEO GROUP confirms that the non-listed additives and monomers present in NEOPET do not meet the criteria for classification as "mutagenic" (*Category 1A, 1B and 2 mutagen*), "carcinogenic" (*Category 1A, 1B and 2 carcinogen*) or "toxic to reproduction" (*Category 1A, 1B and 2 reproductive toxicant*) in accordance with the criteria set out in sections 3.5, 3.6 and 3.7 of Annex I to the CLP Regulation.⁶

Nanomaterials

NEO GROUP confirms that non-listed additives and monomers present in NEOPET are not in nanoform as defined by the Nanomaterial Recommendation.

Sincerely,

Product Development Manager
justina.volcek@neogroup.eu



Justina Volček

⁵ Commission Regulation (EU) No 1130/2011 of 11 November 2011 amending Annex III to Regulation (EC) No 1333/2008 of the European Parliament and of the Council on food additives by establishing a Union list of food additives approved for use in food additives, food enzymes, food flavourings and nutrients

⁶ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labeling and packaging of substances and mixtures (CLP), amending and repealing Directives 67/548/EEC and 1999/45/EC and amending Regulation (EC) No 1907/2006

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2021-07-16 S/21-000207

To Whom It May Concern:

CUSTOMER SUPPORTING DOCUMENT

NEO GROUP is dedicated and fully committed to the successful implementation of Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).

Manufacturers and importers are not obliged to register Polymers itself. However, manufacturers and importers have to guarantee that Polymers are produced from the monomers ending up as building blocks of the polymers and other substances, which were duly registered according to the REACH requirements.

We herewith confirm that our products, trademark NEOPET and NEOPOLYOL, are produced from the monomers and other raw materials, which were duly registered according to the REACH requirements.

NEO GROUP confirms that any chemical substances from Substances of Very High Concern (SVHC) list: 219 (last updated: 8 July, 2021 and published by ECHA <http://www.echa.europa.eu/web/guest/candidate-list-table>) are not used in production process of NEOPET and NEOPOLYOL products.

Sincerely,

Product Development Manager
justina.volcek@neogroup.eu



Justina Volček



DNV

MANAGEMENT SYSTEM CERTIFICATE

Certificate no.:
55137-2009-AQ-LTU-FINAS

Initial certification date:
30 June 2006

Valid:
01 July 2021 – 30 June 2024

This is to certify that the management system of
UAB Neo group
Industrijos g. 2, Rimkų k., LT-95346, Klaipėdos r., Lithuania

has been found to conform to the Quality Management System standard:
ISO 9001:2015

This certificate is valid for the following scope:

Production of polyethylene terephthalate (PET) resins, including production using post-consumer recycled PET (rPET) as a raw material. Production of aromatic polyester polyols.

Place and date:
Espoo, 31 May 2021



FINAS
Finnish Accreditation Service
S001 (EN ISO/IEC 17021-1)

For the issuing office:
DNV - Business Assurance
Keilaranta 1, 02150 Espoo, Finland

Kimmo Haarala
Management Representative

Lack of fulfilment of conditions as set out in the Certification Agreement may render this Certificate invalid.

ACCREDITED UNIT: DNV GL Business Assurance Finland Oy Ab, Keilaranta 1, 02150 Espoo, Finland - TEL: +358 10 292 4200. www.dnvgl.fi/assurance



DNV

MANAGEMENT SYSTEM CERTIFICATE

Certificate no.:
55138-2009-AE-LTU-FINAS

Initial certification date:
02 January 2007

Valid:
01 July 2021 – 30 June 2024

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Industrijos g. 2, Rimkų k., LT-95346, Klaipėdos r., Lithuania

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CERTIFICATE OF QUALITY No 20-1753**NEOPET 80**

Lot. No 220713
Product tested 2020-07-13

Tests of quality	Standard method	Specification	Analytical result
Intrinsic Viscosity, dl/g	WN-B010-7040 D Capillary viscometer	0.80 ± 0.02	0.79
COOH groups, mmol/kg	WN-B010-7013 D Potentiometric titration	≤ 30	21
Dust content, ppm	WN-B010-9031 D	≤ 50	< 50
Acetaldehyde content, ppm	WN-B010-9013 D Gas chromatography	≤ 1	< 1
Colour "b"	WN-B010-7136 D HUNTER Lab	≤ 1	0.26
Water content, ppm	WN-B010-7159 D	≤ 2000	< 2000
Melting point, °C	WN-B010-7089 D DSC	248 ± 4	249
Pellets weight, g/100 pellets	WN-B010-9038 D	1.7 ± 0.1	1.7
Pellet shape	Spherical pellets		

Individual product shipments are not tested for above properties. The aforementioned data are performed in representative samples of the product.

To ensure that the product meets the specification, it is tested regularly in accordance with internal NEO GROUP quality assurance program.

NOTE: Original Certificates with signatures are kept in UAB "NEO GROUP" archives.

Laboratory Technician

Jolanta Pocevičienė

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Company data are collected and stored in
the Register of Legal Entities of the
Republic of Lithuania, managed by
VĮ Registrų centras, Klaipėda branch

Luminor AB
LT44 4010 0510 0468 5965, AGBLLT2X
Bank AB SEB bankas,
LT10 7044 0600 0382 3173, CBVILT2X



Conforms to regulations (EC) Nr. 1272/2008
(REACH)

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Last revision date: September 11, 2017

SECTION 1: IDENTIFICATION OF SUBSTANCE/MIXTURE AND OF THE COMPANY

1.1. Product Identifier:

Label identifier / product name: polyethylene terephthalate, PET, NEOPET, Aqua NEOPET 76, NEOPET 78, NEOPET 80, NEOPET 82, NEOPET 84, NEOPET 82 FR, NEOPET 84 FR, NEOPET 82FR PLUS, NEOPET 84FR PLUS, NEOPET 82 HF, NEOPET AMO, NEOPET AMO FR, NEOPET AMO HF, Ultra NEOPET.

CAS No.: 25038-59-9

EC No.: N/A

REACH registration No.: N/A

Molecular Hill: $(C_{10}H_8O_4)_n$

Polyethylene terephthalate (PET) is a polymer and exempted from Registration according to the Article 2 (9) of Regulation EC 1907/2006 REACH.

1.2 Relevant identified uses of the substance or mixture and uses advised against:

PET (polyethylene terephthalate) for packaging, film, fibers, other product manufacturing.

1.3 Details of the supplier of the safety data sheet:

Manufacturer: UAB NEO GROUP
Industrijos St. 2, LT-95346 Rimkai
Dovilai Eldership, Klaipeda District,
Lithuania

Phone number +370 46 466 710

Fax +370 46 466 711

e-mail msds@neogroup.eu

www.neogroup.eu

1.4 Emergency telephone numbers:

Lithuanian Poison Control and Information Office:

+370 5 236 2052 or +370 687 53 378

Main emergency phone number: (+370) 112 (24h)

SECTION 2: HAZARDS IDENTIFICATION

2.1 Classification of the substance or mixture

2.1.1 Classification according to Regulation (EC) No 1272/2008 [CLP]

Substance not classified as hazardous. Under normal conditions, this product is not hazardous.

2.1.2 Additional information:

Additional information about accidental release measures and exposure control and personal protection see in the 6, 8 paragraphs.

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2.2 Label elements

Labeling according to Regulation (EC) No 1272/2008 [CLP]: not required

2.3 Other hazards:

Spilled pellets create slipping hazard. Molten plastic can cause severe thermal burns. Fumes produced during the thermal processing of polymer melt may cause eye, skin and respiratory tract irritation.

Not applicable. The substance is not PBT / vPvB.

SECTION 3: COMPOSITION/INFORMATION ON INGREDIENTS

3.1 Substances

Components name	CAS No	EC No	Index No	REACH Registration No	Content, % (wt.)	Classification according to Regulation (EC) No 1272/2008 (CLP)
Polyethylene terephthalate (PET)	25038-59-9	N/A	N/A	N/A	100%	not classified as hazardous

Additional information on components: NEOPET resins are plastic intermediate plastic materials manufactured from terephthalic acid (PTA), isophthalic acid (IPA), monoethylene glycol (MEG) and diethylene glycol (DEG) monomers and complies with COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011 and its subsequent amendments on plastic materials and articles intended to come into contact with food. Composition and production process of NEOPET products comply with Framework Regulation No 1935/2004 and COMMISSION REGULATION (EU) 2023/2006 on Good Manufacturing Practices on materials and articles intended to come into contact with food, as applicable to plastic intermediate materials.

3.2 Mixtures: Not applicable

SECTION 4: FIRST AID MEASURES

4.1 Description of first aid measures

Eyes contact: Mechanical injury to eyes is possible. Seek doctor's advice if necessary.

Skin contact: If melted resin comes in contact with skin, the affected place should be washed thoroughly with a plenty of water. Put a sterile bandage on the wound. If burns occur, seek medical advice immediately. Note: never try to take away substance melted to the wound.

Inhalation: After inhalation of vapor from melted substance: Remove person to fresh air as soon as possible. Drink water to clean the mouth and blow the nose to remove the dust. Upon evidence of breathing problems, take a person to the first aid station to provide medical aid.

Ingestion: No toxicity hazard. This substance is biologically inactive. If feel unwell, doctor's advice is recommended.

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SECTION 5: FIRE FIGHTING MEASURES

5.1 Extinguishing media

Suitable extinguishing media: Water aerosol, water/foam, CO₂, A or B class fire extinguishers, AB class fire extinguishers, powder extinguishers.

5.2 Special hazards arising from the substance or mixture

During a fire, smoke may contain the original material in addition to combustion products of varying composition, which may be toxic and/or irritating. Combustion products may include and are not limited to: Carbon monoxide. Carbon dioxide.

Do not stay in dangerous area without personal breathing apparatus.

Large concentration of dust causes explosion risk. Polyesters can ignite if exposed to fire.

5.3 Advice for firefighters

Wear self-contained breathing apparatus and protective clothing.

SECTION 6: ACCIDENTAL RELEASE MEASURES

Procedures to apply to substance spread isolation:

Sweep small quantities of spillage and place them into appropriate container. Stepping or walking on chips or pellets may cause falling; avoid accumulation of chips or pellets on the floor or passages. Collect large pieces.

Cleaning procedures: Contain with shovel or sweep, use special vacuum cleaner to collect small particles/dust. Avoid producing dust clouds. Place into utilization or disposal containers.

SECTION 7: HANDLING & STORAGE

7.1 Precautions for safe handling

Dust and fumes produced during the handling and processing of the product shall be removed by means of effective exhaust ventilation. The friction of product particles can produce static electricity, therefore earthing shall be installed where necessary.

7.2 Conditions for safe storage, including any incompatibilities

The product shall be protected from direct sunlight, UV light, high temperature and rain. Packages and containers shall be closed when stored. For more information, please refer to "Guideline for use of flexible containers".

7.3. Specific way(s) of usage:

Due to wide range of applications, there are no specific usage instructions.

SECTION 8: EXPOSURE CONTROLS / PERSONAL PROTECTION

After pouring out PET pellets appears slipping hazard.

Reference parameters for occupational exposure limit (OEL) factors:

Dust:

Threshold limit value (TLV): temporary TLV (TWA 8 hours) is recommended to apply according to nontoxic gas TLV:

-10 mg/m³ all dust.

-5 mg/m³ inhalation dust.

Acetaldehyde (CAS 75-07-0) (produced during combustion and thermal decomposition process)

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ACGIH: C 25 ppm;
OSHA: 100 ppm TWA; 180 mg/m³ TWA;
150 ppm STEL; 270 mg/m³ STEL.

Respiratory system protection:

Necessary when vapor/dust is produced (vapor is produced when polymer is heated)

Eyes protection:

Necessary when hot melted substance is handled. Wear safety eyewear with side shields and heat-resistant face shields.

Hands protection:

Necessary when hot melted substance is handled. Hot-resistant gloves shall be worn.

Skin protection:

Protective clothes should be selected to meet the requirements of a definite work place, by taking into consideration the concentrations and quantities of dangerous substances to be handled. The chemical resistance of protective clothes shall be found out by contacting the supplier.

SECTION 9: PHYSICAL & CHEMICAL PROPERTIES

Physical state: solid substance under normal conditions
Color: clear or naturally mat, depending on added color agent
Odor: odorless

pH	does not apply	
Boiling point	destruction at >380	°C
Flash point	-	°C
Density	1.34	g/cm ³
Melting point	242-270	°C
Self-ignition point	500	°C
Solubility in water	insoluble	
Viscosity (intrinsic viscosity IV)	0,58-0,84	dl/g
Vapor pressure	(20 °C) does not apply	Pa
Dust explosiveness class	1	

SECTION 10: STABILITY & REACTIVITY

10.1. Chemical stability: stable in normal ambient conditions.

10.2. Conditions: to avoid high temperature, flame and other sources of ignition. Temperatures above 150 °C and/or long retention time shall be avoided when the product is out of the technological process as the product degradation and thermal decomposition can start.

10.3. Substances to avoid: strong oxidizing agents, mineral acids, organic solvents.

10.4. Hazardous decomposition products: during heating process hazardous gas is produced. The composition of the gas depends on the conditions of heating process.

10.5. Hazardous polymerization: unknown.

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SECTION 11: TOXICOLOGICAL INFORMATION

Acute intoxication: No

Additional toxicological information: The substance proved to be nontoxic during standard toxicological and eco-toxicological tests and therefore is considered to be biologically inactive.

Additional data: The product to be handled with carefulness pertaining to bulk substances.

SECTION 12: ECOLOGICAL INFORMATION

Stability/degradability:

Very minor degradability under impact of UV light.

Eco-toxicity:

No signs of hazardous effect on the environment.

Aquatic toxicity:

Insoluble, nontoxic solid substance (no hazardous effect in water).

SECTION 13: DISPOSAL CONSIDERATIONS

Product:

There are no unified EU instructions on the disposal of chemicals and waste. Chemical waste is usually treated as special type of waste. The disposal of this waste in EU countries is regulated by appropriate laws and regulations. We recommend contacting responsible institutions or certified waste disposal companies which could provide information on the disposal of special waste.

Packing:

The disposal shall be carried out in accordance with approved instructions. Contaminated packing shall be processed in the same way as the substance. Unless other official instructions are given, uncontaminated packing can be regarded as household waste or processed.

SECTION 14: TRANSPORT INFORMATION

Transport regulations do not apply.

SECTION 15: REGULATORY INFORMATION

Product is not classified as hazardous according with (EC) 1907/2006 REACH 2.9 article and ES 67/548/EEB.

SECTION 16: OTHER INFORMATION

The information provided in this document is based on the present state of our knowledge. The product is described with regard to safety requirements. The document shall not be considered a guarantee of the product properties.

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General update of the document was made to comply with requirements presented in the regulations (EC) No 1272/2008 of European Parliament and Council.

End of safety data sheet