

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

Tokai Carbon CB products 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)

Class I/II Ozone Depleting Chemicals Under Clean Air Act of 1990

Tokai Carbon CB products do not contain any Class I or Class II ozone depleting chemicals. These chemicals do not exist in the feedstock that is used, and they are not added to our process.

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.

Conflict Minerals

Tokai Carbon CB products 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. We believe that our products meet this regulation because past lab analyses showed that each individual heavy metal was less than 10 ppm in our products.

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).

Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

Carbon black is not regulated under FIFRA.

Japanese Poisonous and Deleterious Substance Control Law

Carbon black is not a listed substance under this regulation.

PAH Content

Polycyclic aromatic hydrocarbons are found in our products with quantities ranging from ppb levels to ppm levels.

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)

Tokai Carbon CB products are registered through an Only Representative located in the EU. 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.

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. We believe that our products meet this regulation because past lab analyses showed that our products were well below these limits.

Right-to-Know Regulation

Carbon black is listed or regulated under the right to know regulation in New Jersey, Pennsylvania, and Massachusetts.

RoHS2 Directive 2011/65/EU Compliance Certification

Tokai Carbon CB, Ltd. is in compliance with the restriction of the use of certain hazardous substances in electrical and electronic equipment regulation (RoHS2 Directive 2011/65/EU). This regulation requires the concentrations of lead, mercury, hexavalent chromium, polybrominated biphenyls, polybrominated diphenyl ethers, pentabromodiphenyl ether, and octobromodiphenyl ether to be less than 1000 ppm and the concentration of cadmium to be less than 100 ppm. Past lab analyses performed on various carbon black grades show that the results were either well below the limit or the chemical was not present in our carbon black.

Switzerland Ordinance on Materials and Articles (SR 817.023.21)

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

UN/DOT Transportation Testing – Self-Heating Status of Carbon Black

The International Carbon Black Association commissioned an independent evaluation of the self-heating properties of seven different grades of carbon black produced by its member companies, representing a sample of commercially available carbon blacks. Chilworth Technology, Inc. (Princeton, NJ, USA) evaluated the flammability/transport classification characteristics according to UN/DOT Transportation Testing N.4 (Division 4.2)/Self-Heating Solids. The results of the testing are summarized below.

Sample	Self-Heating Substances – UN/DOT Test N.4 Division 4.2
N134	NOT a self-heating substance of Division 4.2
N762	NOT a self-heating substance of Division 4.2
N326	NOT a self-heating substance of Division 4.2
N220	NOT a self-heating substance of Division 4.2
N683	NOT a self-heating substance of Division 4.2
N660	NOT a self-heating substance of Division 4.2

N990	NOT a self-heating substance of Division 4.2
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The full report from Chilworth Technology [2017 DOT-UN Self-Heating Substance Report.pdf](#)

UN Transport of Dangerous Goods

Carbon black is not a flammable solid, per test method N.1 as described in Part III, sub-section 33.2.1 of the UN Recommendations on the Transport of Dangerous Goods, Manual of Tests and Criteria.

Carbon black is not classifiable as a Division 4.2 self-heating substance as defined by UN Recommendations on the Transport of Dangerous Goods and the International Maritime Dangerous Goods Code (based on 100mm sample cube).

United States Food and Drug Administration

Tokai Carbon CB products are in compliance with the Food and Drug Administration's requirements, except for the following limitations:

21 CFR 177.260 Carbon black is permitted for indirect contact with food and drugs when used as a filler in rubber articles intended for repeat use.

Limitations: Total carbon black (channel process and furnace process) in the rubber may not exceed fifty percent by weight of the rubber product. Tokai Carbon CB carbon blacks are furnace process blacks. Furnace process black content may not exceed ten percent by weight of rubber product intended for use in contact with milk or edible oils.

21 CFR 177.2400 Carbon black (channel or furnace process) is permitted as an adjuvant substance in perfluorocarbon-cured elastomers that come in contact with non-acid food (pH above 5.0) at concentrations not to exceed 15 parts per 100 parts of the terpolymer.

21 CFR 177.2410 and in phenolic resins in molded articles that come in contact with non-acid food (pH above 5.0)

21 CFR 178.3297 Colorants for polymers is restricted to containing total polynuclear aromatic hydrocarbons not to exceed 0.5 ppm and benzo(a)pyrene not to exceed 5.0 ppb

United States SARA Title III 311/312

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

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