



## FDA Letter of Continuing Guarantee

March 10, 2020

BJK Flexible Packaging's film and bags are compliant with FDA regulation 21 CFR 177.1520 for food contact. They are produced using resins from prime resin producers in the United States and Canada and are intended for use as a container, wrapper, or cover for products in an atmosphere where temperatures are between  $-30^{\circ}\text{F}$  and  $160^{\circ}\text{F}$ . All BJK plastic film products are produced in the United States. BJK's products are packaged securely to prevent contamination and should be handled carefully to prevent damage while in transit or storage.

All product analyses and appropriate inspections, as set forth in BJK's quality procedures, have been performed to ensure conformance to the above specification prior to shipment.

### **Heavy Metals**

In addition to the regulations cited above, BJK's products also meet CONEG limitations of less than 100 ppm of combined Hg, Pb, Cr(VI), and Cd. Also, there are no phthalates included in the manufacture of these materials, but please be aware that we do not test for these.

### **Synthetic Antioxidants and Azodicarbonamide**

Products from BJK contain no synthetic antioxidants (BHA, BHT, or TBHQ) nor azodicarbonamide. Be aware that we do not test for these materials.

### **Allergens, Phthalates, HCFCs, benzophenone, and BPA**

Products from BJK contain no known allergens, in particular those from the primary allergen families, but it needs to be known that we do not test for these allergens. Additionally, there are no known hydrofluorocarbons (HCFCs) included as well. Also, there are no known phthalates, benzophenone (and derivatives) or BPA intentionally included in the products, but again, we do not test for these.

### **California Proposition 65**

There are no materials in BJK formulations listed as part of the formulations at levels that are subject to regulation in California Prop 65. Again, we do not analyze for these materials.

### **Stockholm Convention POPs**

There are no Persistent Organic Pollutants intentionally added to any BJK products as defined in the Stockholm Convention. However, we do not analyze for these.

### **Latex, PVC, and Asbestos**

There are no raw materials used in our products that contain either latex or PVC, so finished products contain neither. As before, we do not analyze for these materials. Additionally, there is no asbestos used in our production processes.

### **Animal Derived Materials**

BJK Industries supplies polyolefin-based film and bags to the food industry. BJK has now modified their materials to exclude animal-based components. Because of this, there are no pathways for the inclusion of prions that are responsible for BSE/TSE transmission.

### **Kosher and Halal Compliances**

BJK has now modified its formulations for Halal and Kosher applications to be fully free from animal sources. Because of this, Kosher and Halal compliances are claimed, but no Kosher or Halal certifications have been made.

### **RoHS2 and RoHS3 Compliance**

BJK's films are not manufactured with components containing substances that would prevent compliance with EC Directive 2002/95/EC RoHS Directive and with Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 and subsequent amendments. The materials covered in this compliance statement and their maximum allowable amounts are listed in Appendix A.

### **EU (REACH) Compliance**

BJK confirms that the materials/parts currently supplied to our customers do not contain any chemicals identified as Substances of Very High Concern

(SVHC's) as defined in EU Regulations 552/2009 and 1907/2006 as restricted substances in Annex XVII Appendices 1-10 and all subsequent Candidate List annexes and appendices. It needs to be noted that we do not test for these materials. This list of substances is updated regularly. In as much, this certification is intended to serve as an ongoing declaration, whereby BJK will provide customers proactive notice if newly added REACH SVHC's are contained within our product at any time in the future.

### **GMOs**

There are no genetically modified materials used in the manufacture of BJK products.

### **Conflict Minerals**

There are no conflict minerals used in the manufacture of BJK's products or the raw materials utilized by BJK.

### **Federal Food Drug and Cosmetic Act**

The materials manufactured at BJK comply with the Federal Food Drug and Cosmetic Act.

### **Food Defense**

BJK production areas are locked at all times and are accessed by employees with key cards. Additionally, our perimeters are secured using video cameras at all times. Employees are screened prior to employment, and all are trained to recognize unknown individuals.

### **Food Fraud Matrix – See appendix B**

If there are any questions concerning this document, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Keith Wilbourn". The signature is written in a cursive, flowing style.

Keith Wilbourn

Director of Technology

BJK Flexible Packaging

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## Appendix A – RoHS 2 and 3 Materials

**Quantity limit:** 0.1 % of weight (1000ppm) of any homogeneous material:

1. Lead (Pb)
2. Mercury (Hg)
3. Hexavalent Chromium (Cr VI)
4. Polybrominated Biphenyls (PBB)
5. Polybrominated Diphenyl Ethers (PBDE)

**Quantity limit:** 0.01 % of weight (100 ppm) of any homogeneous material:

1. Cadmium (Cd)

**Quantity limit:** 0.1 % of weight (1000ppm) of any homogeneous material:

1. Bis(2-Ethylhexyl) phthalate (DEHP)
2. Benzyl butyl phthalate (BBP)
3. Dibutyl phthalate (DBP)
4. Diisobutyl phthalate (DIBP)

**Appendix B**  
**Food Fraud Matrix**

# Food Fraud Vulnerability & Mitigation

Rev 00

Product Safety Program 01-122

2/28/2020

Quality/Product Safety

Motivation	Potential Risk	Risk Assessment	Vulnerability Assessment
Economic Gain	Substitute lower quality resin for extrusion - resin not acceptable for indirect food contact	<b>VERY LOW</b>	BJK only uses virgin resins purchased from prime resin producers in the US and Canada. Compliance letters are on file for resins used. No recycled resins are used.
Unintended Health Hazards	Resins or product are intentionally contaminated. Foreign objects are placed in resin.	<b>VERY LOW</b>	Railcars are sealed (cleaned prior to loading). Screens are used in extruders to prevent foreign objects from entering. Our process contains no CCP's. We do not add water or chemicals during processing.
Ethical/Religious Concerns	Resins contain animal derived materials, wheat or gluten.	<b>VERY LOW</b>	While some of our resins originate from animal sources, these components have been chemically altered and have undergone significant chemical processing. As a result, these are now considered synthetic in nature mitigating any possibility that prions are passed from animal-derived additives to the finished product.
Intentional Harm	Intentional contamination of resins or product by chemicals or foreign objects.	<b>VERY LOW</b>	Silos and exterior hoses remain locked when not in use. Facility is fenced and locked after hours. No water or chemicals are added during processing making contamination more difficult. Our film is extruded at 400 deg F which will kill any organisms.