



July 17, 2019

RE: **Regulatory Compliance of YUPO Jelly™ Grade: XAD1068**

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) –  
Proposition 65 chemical (list effective date: June 28, 2019);  
Consumer Product Safety Improvement Act (“CPSIA”);  
States’ Toxics in Packaging Legislation;  
The Canadian Environmental Protection Act of 1999 (“CEPA”) –  
DSL, NDSL, Batches 1 to 12, and Schedule 1 (November 21, 2014);  
The European Union’s Restriction of Hazardous Substances (“EU RoHS”) recast Directive  
2011/65/EU;  
The European Union’s Registration, Evaluation, Authorization and Restriction of Chemical  
Substances (“EU REACH”), EU Regulation 1907/2006/EC, through July 16, 2019  
Dodd-Frank Conflict Minerals Act  
China’s Restriction of Hazardous Substances Directive (China RoHS), Joint Ministerial Decree No.  
39  
China’s Measures for Environmental Administration of New Chemical Substances IECSC March 8,  
2016 (China REACH)  
The International Electrotechnical Commission Standard (IEC) 62474. (List update: April 5, 2018)

We have reviewed the above referenced environmental documents against the manufacture of the YUPO® grade shown above. This grade complies with these directives, in that, we do not intentionally add any restricted materials to our product, however, trace amounts of some substances may be present as residuals from our suppliers manufacturing process, such as catalytic reactions, or as impurities from base raw materials. Only the component below was at a level worth noting. All other substances are well below established threshold values.

<u>Substance Name</u>	<u>CAS Number</u>	<u>Concentration</u>
Antimony Trioxide	1309-64-4	<135 ppm

With regard to Proposition 65, the law directs companies operating or selling products in California to provide a warning before exposing anyone to any chemicals set forth on a specified list of chemicals California has determined can cause cancer or birth defects or other reproductive harm. The list contains a wide range of naturally-occurring and synthetic chemicals that are found in a wide range of products, including food, drugs, and common household products. Notable exceptions to the warning requirement apply if exposures to listed chemicals are below certain specified threshold limits, or if it can be demonstrated that there is no risk of exposure. As noted above, YUPO products do contain trace amounts of several substances covered by the law. Although California has developed exposure threshold levels for some of these substances, these levels apply to actual exposures, not the concentration of the chemicals in the products.

With regards to the Dodd-Frank Conflict Minerals act, Yupo Corporation America does not use any raw materials in our products that are covered under this regulation.

Additionally, we do not intentionally add any of these other chemicals of concern: phthalates, latex, BPA (Bisphenol-A), PFCs, or per- and polyfluoroalkyl substances (PFAS), perfluorochemicals, including perfluorooctansulfonate, and/or fluorotelomers.

This letter may be supplemented from time to time as individual regulations and standards are revised.

I hope this answers your concerns about our product. Feel free to contact us if you need any additional information.

Sincerely,



Brad Whitlow  
Director, Quality Assurance  
Yupo Corporation America  
(757)-819-9317  
[bwhitlow@yupo.com](mailto:bwhitlow@yupo.com)