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FDA & REACH CERTIFICATE OF COMPLIANCE FOR METAL DETECTABLE CABLE TIES & ACCESSORIES

The purpose of this letter is to provide information regarding the regulatory requirements for metal detectable cable ties & accessories produced at Advanced Cable Ties, including USFDA and Regulation (EU) 10/2011 for food contact status.

These products, as manufactured by Advanced Cable Ties, conform to the following regulations based on information provided to Advanced Cable Ties by its raw material supplier:

Regulations (EC) No. 1935/2004 and (EC) 2023/2006: Compliance with these regulations are described below:

Organoleptic Properties:

These products are not known or expected to cause an unacceptable change in the composition of the food, or cause a deterioration in the organoleptic properties of the food.

Impurities:

Nylon Resin – None known or expected to be present above 1% in its portion. Siloxane – None known or expected to be present above 2% in its portion. Steel – None known or expected to be present above 1% in its portion.

Migration Limits:

See Regulation (EU) No. 10/2011, below.

Regulation (EU) 10/2011 and Up-Dates: Advanced Cable Ties Metal Detectable products meet the compositional requirements of Regulation (EU) 10/2011 as follows:

Component	FCM	Ref. No.	Substance Name:	SML	SML(T)	Restrictions
PA-66 Resin	305	15274	Hexamethylene	2.4		
	303	18460	Diamine			
		12130	Adipic Acid			
		31730				
Steel Portion	80	87160	Stainless Steel			
Siloxane	575	76721	Polydimethylsiloxane			Viscosity at 25 °C not
Portion			(MW >6 800 Da)			less than 100 cSt
						(100 x 10-6 m2/s)
PA-6 Resin	212	14200	Caprolactam		15	
		41840				
Proprietary	496	71680	Pentaerythritol			
Ester			Tetrakis[3-(3,5-di-			
			tert-butyl-1-4-			
			hydroxyphenyl)-			
			propionate]			
Antioxidant	773	38840	Bis(2,4-	5		
			dicumylphenyl)			
			pentaerythritol-			
			diphosphite			

FCM = Food Contact Material

SML = Specific Migration Limit

SML(T) = Specific Migration Limit (Total)

USFDA: Advanced Cable Ties Metal Detectable products meet the compositional requirements of the following regulations:

Component	Regulation	Title	FDA Part	
PA-66 Resin	21 CFR 177.1500	Nylon Resins	Indirect Food Additives: Polymers	
	21 CFR 176.170	Components of Paper & Paperboard	Indirect Food Additives: Paper & Paperboard	
		in Contact with Aqueous & Fatty	Components	
		Foods		
	21 CFR 176.180	Components of Paper & Paperboard		
		in Contact with Dry Food		
Steel Portion	21 CFR 184.1375	Iron, Elemental	Direct Food Substances Affirmed as Generally	
			Recognized as Safe	
Siloxane Portion	21 CFR 181.28	Release Agents	Prior Sanctioned Food Ingredients	
	21 CFR 175.105	Adhesives	Indirect Food Additives: Adhesives and	
	21 CFR 175.300	Resinous & Polymeric Coatings	Components of Coatings	
	21 CFR 175.320	Resinous & Polymeric Coatings for		
		Polyolefin Films		
	21 CFR 176.170	Components of Paper & Paperboard	Indirect Food Additives: Paper & Paperboard	
		in Contact with Aqueous & Fatty	Components	
		Foods		
	21 CFR 176.180	Components of Paper & Paperboard		
		in Contact with Dry Food		
	21 CFR 176.200	Defoaming Agents Used in Coatings		
	21 CFR 176.210	Defoaming Agents Used in the		
		Manufacture of Paper & Paperboard		
	21 CFR 177.2260	Filters, Resin Bonded	Indirect Food Additives: Polymers	
	21 CFR 177.2600	Rubber Articles Intended for		
		Repeated Use		
PA-6 Resin	21 CFR 177.1500	Nylon Resins	Indirect Food Additives: Polymers	
	21 CFR 175.105	Adhesives	Indirect Food Additives: Adhesives and	
			Components of Coatings	
	21 CFR 177.1200	Cellophane	Indirect Food Additives: Polymers	
	21 CFR 177.2260	Filters, Resin Bonded		
Proprietary Ester	21 CFR 177.1680	Polyurethane Resins	Indirect Food Additives: Polymers	
Antioxidant	21 CFR 177.1520	Olefin Polymers	Indirect Food Additives: Polymers	
	21 CFR 176.170	Components of Paper & Paperboard	Indirect Food Additives: Paper & Paperboard	
		in Contact with Aqueous & Fatty	Components	
		Foods		
	21 CFR 176.180	Components of Paper & Paperboard		
		in Contact with Dry Food		

Based on Advanced Cable Ties Supplier data regarding Substances of Very High Concern (SVHC) (REACh): Advanced Cable Ties Metal Detectable products contain no substances on the revised SVHC list of 20-Jun-16.

Signed Electronically,

Jeffrey Arnold

Jeffrey Arnold, Quality Control Manager