

April 11, 2022

Mr. Brandon Gilliam
Ark-Plas Products, Inc.
Purchasing Manager/Regulatory
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Dear Mr. Gilliam,

This letter is in response to your request for information regarding the below listed product, as supplied by Trinseo LLC or its affiliates.

- CALIBRE[™] 201-15 NA FC030003 Tint Polycarbonate Resin

In response to your request for information regarding materials of animal origin, the above mentioned product contains a raw material that is synthesized from animal extracts, i.e., hydrolysis, etc. of animal fats and oils into fatty acids.

According to our supplier, the animal extract is sourced from animals in the EU region primarily from bovine (beef) sources. The chemical products (fatty acids and glycerine) are derived from tallow meeting EU Category 3 and have been produced under conditions which are in compliance with the minimum conditions described below for the processing of rendered fats listed in Annex XIII, Chapter XI of the EU Regulation 142/2011/EC. The requirements of EMA/410/01 Rev. 3 (2011/C 73/01), Chapter 6.4 are fulfilled. EU Regulation 1774/2002 has been replaced by the EU Regulations 1069/2009/EC of October 21, 2009 and 142/2011/EC of February 25, 2011.

Process Conditions in Regulation 142/2011/EC Annex XIII, Chapter XI:

1. Transesterification or hydrolysis at at least 200°C, under corresponding appropriate pressure, for 20 minutes (glycerol, fatty acids and fatty acid esters) or
2. Saponification with NaOH 12 M (glycerol and soap)
 - I. in a batch process: at 95°C for 3 hours; or
 - II. in a continuous process: at 140°C, 2 bars for 8 minutes; or
3. Hydrogenation at 160 deg C at 12 bars for 20 minutes.

As per the supplier, fat derivatives emerging from hydrolysis of rendered fats do not fall under the scope of the EU Regulation 1774/2002. Products from further processing (e.g. hydrogenation, fractionation and distillation) are considered to be chemical products, not fat derivatives.

If you have any additional questions or comments, please feel free to contact me.

Sincerely,



Bruce Gutzmann

North American Product Stewardship Specialist

Trinseo LLC

Functional Mailbox Email: FTNSTPS@Trinseo.com

BG/cw

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