



2 January 2019

Dear Valued Customer:

Thank you for your recent inquiry about our hydrous and calcined kaolin products relative to their approval for use in applications that come in contact with food. Kaolin is a naturally occurring mineral and as such is REACH exempt. It is classified as GRAS (Generally Recognized as Safe) under US Title 21 CFR 186. Kaolin is approved for use around the world as an additive in packaging or for use in coatings that come in contact with food. I have listed below where our hydrous kaolin and calcined kaolins are approved for use as in additive in applications that come in contact with food assuming that kaolin products are incorporated using good manufacturing practices.

1. US FDA 176.170 Components of paper and paperboard in contact with aqueous and fatty food (dated 1 April 2018)
2. US FDA 176.180 Components of paper and paperboard in contact with dry food (dated 1 April 2018)
3. US FDA 175.300 Resinous and Polymeric Coatings (dated 1 April 2018)
4. US FDA 175.105 Adhesives and Components of Coatings, Subpart B (dated 1 April 2018)
5. US FDA 186.1256 Packaging Additive Used in Indirect Contact with Food (dated 1 April 2018)
6. US FDA 178.3297 Colorants for Polymers (dated 1 April 2018).
7. US FDA 177.2600 Rubber Articles Intended for Repeated Use (dated 1 April 2018)
8. BFR XXXVI, XXXVI/1, XXXVI/2 (all updated 01.09.2017) and LII. (Updated 01.09.2017)
9. COE's Paper Resolution Version 2
10. EU 10/2011 (kaolin limited to 12% total concentration used in EVOH that is directly in contact with food). Biocides in slurry products are not approved for use in plastic applications.
11. ANVISA – Agência Nacional de Vigilância Sanitária – Portaria 177 de 04 de Março de 1999
12. GB 9685-2016 Hygienic Standards for Use of Additives in Food Containers and Packaging. (kaolin is listed for use in coatings, paper and plastic applications without limit)
13. GB 4806.6-2016 Compliant with food packaging purity standards.
14. Italien Decreto Ministeriale D.M. 21/03/73
15. EC 1935/2004 – compliant with requirements for food contact materials.

Our products can contain dispersants that are approved for use in these applications as well but may contribute to specific migration limits outlined under specific regulations. Our slurry products would also contain biocides which are also subject to limits in terms

Information contained in this letter is for general information only. Customer is responsible for their specific regulatory requirements and should make their own assessment of the suitability of any product use.



of residual concentrations. Biocides are added below any threshold limit outlined by the regulations listed above. Please let us know if you need more information concerning the levels of these additives.

In addition our kaolin products and processing aids are free from any mineral oil, fluorochemicals (including PFOAs and PFOs) and do not contain any material from animal origins or genetically modified organisms. Our products are also free from allergens outlined by the US FDA and EU directive 68/2007. Our products do not contain melamine, cyanuric acid or its derivatives, Bisphenol A, Pthalates, Azo dyes or alkyl or alkylphenolic ethoxylate surfactants.

Our products are also registered and approved for use by the US EPA as inert ingredients for food use under 40 CFR 180.910 and 930.

Our products are complaint with Ecolabeling Nordic Swan requirements.

We trust that this answers your question about our kaolin products from KaMin and CADAM. Please don't hesitate to contact us if you have additional questions.

With Best Regards,

A handwritten signature in blue ink that reads 'Doug Carter'.

Doug Carter, Ph.D.

Vice President – Technology and Business Development