

## ELEMATIC DETECTABLE CABLE TIES

Cable Ties in Polyamide 6.6 for identification by Metal Detectors and/or X-ray inspection equipment.

5203/C DTE	98x2,5
5209/C DTE	140x3,5
5214/C DTE	200x3,5
5215/C DTE	200x4,5
5217 DTE	290x4,5
5219 DTE	360x4,5
5227 DTE	365x7,5



Cadoneghe, Padova, Italy - Via Edison, 23

October 1<sup>th</sup>, 2020

### **OBJECT: Declaration on Raw Material - FDA Compliance** <sup>(1) (2) (3)</sup>

The following declaration is intended to provide information on requirements placed on raw material (Polyamide pre-Mixed with additives, for producing Detectable Cable Ties, following named as Polyamide 66 DET PG – 5015 BLUE) for use in food contact, according to the applicable provisions of the U.S. Food and Drug Administration (FDA). <sup>(3)</sup>

For the production of the above-mentioned Detectable Cable Ties, ITW Construction Products Italy uses, in its plants, Polyamide 66 pre-mixed with addition of additives. We handle and process the raw material according to the manufacturer's recommendations. The data listed below is based on information from our raw material suppliers.

### **FDA regulations Title 21 Code of Federal Regulations 177.1210 and 177.1500 FDA compositional criteria for contact with all food types listed in Table 1 and under conditions of use A through H, as described in Table 2, Section 176.170 (c).**

Polyamide 66 DET PG - 5015 BLUE are in compliance with FDA regulations Title 21 Code of Federal Regulations 177.1210 and 177.1500 for the use in articles intended for contact with foodstuff, except for articles used for hold-ing food during cooking.

The raw material meets FDA compositional criteria for contact with all food types listed in Table 1 and under conditions of use A through H, as described in Table 2, Section 176.170 (c).

### **Regulation (EU) 10/2011 (repealing Directive 2002/72/EC) is a specific measure defining the com-positional requirements for plastic materials intended to come into contact with foodstuff according to the general framework regulation (EC) 1935/2004.**

Polymers and additives used in the raw material, (Polyamide 6.6 DET - 5015 BLUE) comply with the lists for monomers and additives of regulation (EU) 10/2011 as amended (up to regulation (EU) 2019/1338).

Polyamide 66 DET PG - 5015 BLUE, contains at least one substance of Annex I and / or Annex II subject to SML/SML (T) <sup>(1) (2)</sup>

Polyamide 66 DET PG- 5015 BLUE contains at least one substance which is considered as dual-use additive (Article 11.3 & Annex IV of Regulation (EU) 10/2011). <sup>(1) (2)</sup>

Polyamide 66 DET PG- 5015 BLUE contains at least one NIAS substance to be considered by downstream operator. <sup>(1) (2)</sup>

<sup>(1)</sup> Please note:

- Any tests are not performed in order to check if above mentioned Detectable Cable Ties complies with the OML of 10 mg/dm<sup>2</sup> (surface in contact with foodstuff) resp. 60 mg/kg (food intended for infants and young children as defined by Commission Directives 2006/151/EC and 2006/125/EC).
- Any tests are not performed in order to check if above mentioned Detectable Cable Ties complies with restrictions given in Annex II.

<sup>(2)</sup> For more information please contact us. Please note, that extraction, migration, and NIAS testing, and organoleptic tests are not part of our quality control and in quality control of raw material supplier.

<sup>(3)</sup> ITW Construction products Italy makes no warranty of the results a customer may obtain in any particular use or in any application of its products.

ITW Construction Products Italy does not approve the use of this product in any application classified as medical device, drug packaging or any other application in contact with drugs/pharmaceuticals.

Customers using above mentioned Detectable Cable Ties for the fabrication of finished articles intended to come into contact with food must ascertain, through the appropriate testing that these articles do not bring about an unacceptable change in the composition of the foodstuffs or a deterioration in the organoleptic characteristics thereof and comply with the general regulatory requirements in all countries.

ITW Construction Products Italy cannot anticipate all conditions under which this information and our Detectable Cable Ties, or the products of other manufacturers in combination with our Cable Ties may be used.

ITW Construction Products Italy accepts no responsibility for results obtained by the application of these information or safety and suitability of our above-mentioned Detectable Cable Ties, either alone or in combination with other products.

Users are advised to perform their own tests to determine the safety and suitability of each such product or product combination for their own purpose. Unless otherwise agreed in writing, ITW Construction Products Italy supplies Detectable Cable Ties without guarantee, and buyers and users assume all responsibility and liability for loss or damage arising from handling and use of our Detectable Cable Ties, whether used alone or in combination with other products.

ITW Construction Products Italy, of course, do not control the conditions under which our Detectable Cable Ties are used in customer products, devices or equipment. Therefore, ITW Construction Products Italy is not in a position to warrant that customer products or equipment, which contain Detectable Cable Ties, meet the regulatory requirements for the use in contact with foodstuff.

This declaration expires earlier of 6 months from issue date or changes of the cited regulations become effective.

### **Michele Lucon**

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