



To whom it belongs

Re: Updated 2017 Statement of Product Compliance - Building Products of Canada

As requested, the following are general statements of compliance for all the Paper Products, woodfiber boards and packaging materials supplied by Building Products of Canada Corp:

1. European Union Regulation: REACH (Registration, Evaluation, and Authorization of Chemical Substances)

Building Products of Canada hereby certifies that we do not add any chemical substance or process additives into our products, as included in the Candidate list on July 7<sup>th</sup>, 2017 of Very High Concern (SVHCs) or any of the 64 substances or categories of restricted substance list (RSL) mentioned in REACH Annex XVII (22 June 2009 amendment No 552/2009). It is worth noting, that Reach RSL categories do not pertain to paper products.

2. European Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)

ROHS and ROHS2 only cover Electrical and Electronic Equipment (EEE). Even if this regulation does not apply to paper or wood products, Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton, AB facility do not use in our processes nor contain any of the chemical substances covered by RoHS directive, i.e., Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE).

3. Proposition 65 Safe Drinking Water and Toxic Enforcement Act California Environmental Protection Agency

Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton, AB facility do not have any chemical substance or process additives added in the production process. We further certify that none of the chemicals listed in the Proposition 65 list (November 14, 2016), as published by the Office of Environmental Health Hazard Assessment, are contained in our Paper products.



# 4. Canadian Environmental Protection Act (CEPA) - CEPA Toxic substances list.

Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton (AB) facility do not use in our processes nor contain any of the chemical substances in the Toxic substances list (updated June 14<sup>th</sup> 2017) or the export control list revised on January 11<sup>th</sup> 2017 as published on Environment Canada website.

## 5. Consumer Product Safety Improvement Act (CPSIA)

The chemical mentioned below are part of the CPSIA regulation that covers articles and furniture-articles intended for use by children. These chemicals are regulated for cover paint, surface coatings and plasticizer for toys. Even if this regulation does not apply to paper or wood products, Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton, AB facility do not use in our processes nor contain any of the chemical substances below:

- Antimony;
- Arsenic:
- Barium;
- Selenium;
- Chromium;
- Mercury;
- Cadmium;
- Lead;
- Phthalates (plasticizer).

#### 6. Lacey Act (2008 amendment)

Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton, AB facility do not use in our processes any illegally sourced timber.

## 7. Ozone depleting substances

Building Products of Canada hereby certifies that our Paper Products manufactured at our Edmonton, AB facility do not use in our processes nor contain any depleting ozone substances, i.e., chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbon (HFCs).



## 8. Indirect or secondary packaging

Building Products of Canada hereby certifies that our paper products and natural wood fiberboards can be use for indirect packaging or secondary packaging in Canada or in the USA. Accordingly to the Canadian Food Inspection Agency (CFIA), these products are exempted from the CFIA evaluation, since they meet all the legal requirements of Division 23 of the Food and Drug Regulations (23 December 2013). Our products are not intended for direct or primary packaging, but they meet all the requirements of the FDA 21 CFR 176 through 180. EPA or third party organism do not certify paper or cardboard products as "food safe", thus, it belong to the manufacturer to insure that its product meet all the prescription mentioned in CFR part 176 through 180.

#### 9. North American formaldehyde emission standards

- a) In July 2010 "Formaldehyde Standards for Composite Wood Products" was enacted by the US government as title VI of Toxic Substances Control Act (TSCA 15 U.S.C. 2697). Implementation of the standard has started on July 2013 and the final rule was published in December 2016. The final implementation occurred in May 2017. This standard mirrors California Air Resources Board (CARB) regulation 93120. Both regulations exclude that fiberboards manufactured to meet ASTM C208-08a or CAN ULC S70. Because woodfiber boards are not manufactured with formaldehyde resins, CARB clearly exclude the fiberboard from composite wood on point 9 of its FAQ, while 15 USC 2697 does not include the fiberboard in its definition of composite wood product. Even though fiberboards manufactured Building Products of Canada are excluded from CARB and USC 2697 legislations, we hereby certifies that our wood panels meet or exceed the specifications of the US Standards phase 2 (2011) for particleboards, i.e., lower than 0.09 ppm of formaldehyde as determined via ASTM E 1333-96. No Canadian standard on wood-composite's formaldehyde emission is currently available, but are currently under development since March 2017.
- Building Products of Canada hereby certifies that formaldehyde based compounds are not use in our processes and are not present in our wood products produced either in Edmonton or Pont-Rouge.

## 10. Safety data sheet

BP products are articles. They are not chemicals or hazardous substances; they do not require a SDS or a MSDS.

#### 11. Elemental Chlorine Free

Building Products of Canada hereby certifies that our paper products and natural wood fiberboards are chorine free, i.e., chlorine is not use in any part of our production process.

### 12. Food allergen free

Building Products of Canada hereby certifies that our paper products and natural wood fiberboards are free of food allergens, foodstuffs or animal derived materials. Note that these products are not designed to be eaten or be in direct contact with food.



## 13. Substances identified by the Stockholm Convention as Persistent Organic Pollutants (POP)

Building Products of Canada hereby certifies that our paper products and natural wood fiberboards are free of POP's, as defined by the May 2001 Stockholm convention.

# 14. Strong Sensitizers identified by CFR title 16 volume 2 section 1500-13 (16 CFR Ch.II §1500.13)

Building Products of Canada hereby certifies that our paper products and natural wood fiberboards are free of strong sensitizers.

# 15. California's Transparency in Supply Chains Act 2010 (Sen. Bill No. 657)

Building Products of Canada has not conspicuously post the mandatory disclosure outlined in the Act on its website. All our wood and paper products are manufactured locally using indigenous raw materials. Thus, the risk of non compliance to the act is insignificant.

# 16. Conflict Minerals, i.e., natural resources extracted in a conflict zone and sold to perpetuate the fighting

Building Products of Canada does not use in any part of its process conflict minerals such as: Tin, Tantalum, Tungsten or Gold or any other derivatives of columbite, tantalite (coltan, cassiterite, or wolframite).

# 17. Other chemicals or family of chemicals of concerns

In Annex we have added a list of other chemicals of concern. The listed chemicals are most certainly covered by the sections above, but are included herein for sake of completeness.

We trust this information is of assistance to you and your customers. Building products of Canada Corp. is committed to product safety and reporting as a supplier of products.

Sincerely,

Dr Francis Bossé, chemist

R&D Manager

**Building Products of Canada Corp.** 

tel: (514) 364-8768 email: fbosse@bpcan.com



#### **Annex**

## Other Chemicals of concerns\*

Building Products of Canada hereby certifies that the products we manufacture do not contain any of the following substances:

- 1,4-Dioxane;
- 2-Isoproplythioxanthone (2-ITX);
- 4- methylbenzophenone (4-MBP);
- Anthraquinone (CAS No. 84-65-1);
- Asbestos;
- Azo Dyes;
- Benzenamine, N-phenyl-, Reaction Products with Styrene and 2,4,4-Trimethylpentene CAS# 68921-45-9;
- Benzophenone (BP);
- Bisphenol A (BPA)
- Bisphenol S (BPS);
- Butylated Hydroxyanisole (BHA);
- Butylated Hydroxytoluene (BHT);
- Chlorinated Phenols (including: Pentachlorophenol (PCP) and Tetrachlorinated phenol (TeCP);
- Cocamide Diethanolamine:
- Diethanolamine (DEA);
- Dimethylfumurate (DMF);
- Dioxin;
- Halogenated Flame Retardant;
- Latex;
- Melamine;
- Nonylphenol;
- Nonyl and Alkyl Phenol Ethoxylates;
- Optical brighteners or fluorescents;
- Ozone Depleting Substances (ODS): as identified by the Montreal Protocol (2007);
- Parabens (including Butylparaben, methylparaben, propylparaben);
- Perfluorooctanoic acid (PFOA) and perfluorooctyl sulfonates (PFOS);
- Phthalates:
- Polychlorinated Compounds: Polychlorinated biphenyls (PCB), polychlorinated dibenzo-p-dioxins (PCDD) and polychlorinated dibenzofurans (PCDF)
- Polycyclic aromatic hydrocarbons (PAH)
- Radioactive Substances;
- Styrene;
- Trithanolamine
- Vinyl Chloride;
- Tris (2,3-dibromopropyl) phosphate (TDBP) (CAS# 126-72-7).
- \* When present in a significant amount, subtances above have to be declared in a MSDS and/or SDS.