



June 17, 2020

Jeff Van den Boom
General Manager
Buzz Converting
4343 E. Fremont St.
Stockton, CA 95215

Via e-mail: jeff@pacificpapertube.com

Re: ***Product Regulatory and Environmental Compliance***

Dear Mr. Van den Boom:

We are pleased you have placed your confidence in Caraustar as we seek to be your First Choice for Recycled Paperboard Products and Services. Thank you for your inquiry regarding the materials used in the manufacture of our products.

The following information and certifications are subject to the terms and conditions of purchase of, and apply only to, the recycled paperboard product(s) listed below (collectively, the "Product") that are manufactured and sold by the mill(s) listed below (collectively, the "Facility"), and does not apply to their subsequent use in any process or in combination with any other materials:

- ***Chipboard (produced at Caraustar – Tacoma)***

Recycled Content

The Product is a 100% recycled paperboard product, made completely from recovered waste paper. Our mills are at all times using "100% reclaimed paper"; classified as "post-consumer waste" or "post industrial waste." The percentage of consumer / industrial waste will vary during production, depending on sources and collections.

Lacey Act

The Product is manufactured with 100% Recycled Paperboard.

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AUSTELL THREADMILL COMPLEX · 5000 AUSTELL-POWDER SPRINGS ROAD · SUITE 300
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FDA Food Contact (only when expressly stated on the applicable purchase order as FDA compliant.)

Based upon information provided by our suppliers, an outside testing laboratory, and upon our own good manufacturing practices, each shipment or delivery of Products that are expressly ordered as FDA compliant shall be, as of the date of such shipment or delivery, in compliance with the following specifications, to the extent the same are applicable to Caraustar: (i) 21 CFR 176.170 for components of paper and paperboard in contact with fatty and aqueous food, (ii) 21 CFR 176.180 for components of paper and paperboard in contact with dry food and (iii) 21 CFR 176.260 for pulp from reclaimed fiber. This certification shall be of no effect if customer's use of the Products is not authorized by Caraustar or is not in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (the "FDCA"). This certification is contingent on your immediate written notice to Caraustar of any claim or charge that the Product is or may be in violation of the FDCA. In the event of any claim that any Product designed by Caraustar as FDA compliant violates the FDCA, Caraustar shall have the right at Caraustar's option to participate in or assume complete management of such proceeding.

CONEG, Heavy Metals & Reduction of Toxics in Packaging

The Product does not intentionally contain lead, cadmium, mercury or hexavalent chromium. The results of the most recent quarterly testing of paperboard produced at the Facility indicate that the sum of heavy metal concentration in the paperboard that was tested did not exceed 100 ppm.

Allergens

Caraustar does not intentionally introduce into our production process any of the following major food allergens: celery, eggs, fish, milk, mustard, peanuts, sesame seeds, crustacean shellfish, soybeans, sulfites, sulfur dioxide, tree nuts or wheat.

REACH

The products listed above are an "Article" as defined in Art. 3 (3): "*an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition*". The Product is not designed to intentionally emit or exude chemical substances, and to our knowledge, the Product does not contain any Substances of Very High Concern (as defined by and listed in REACH as of the date of this letter) in an amount greater than 0.1%. The Product is produced from recovered fiber and allows for future recovery and recycling according to the objectives of the European Directive on Packaging and Packaging Waste.

California Safe Drinking Water & Toxic Enforcement Act of 1986 (Prop 65)

The Product complies with the requirements in the California State Drinking Water and Toxic Enforcement Act of 1986 (Prop 65), and, to our knowledge, contains no substances that require declaration under the provisions of this regulation.

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Conflict Minerals – Democratic Republic of the Congo & Neighboring Countries

The Product is made out of recycled paperboard and recovered fiber. If there are any Conflict Minerals contained in the Product, they are not intentionally added and they are from an unknown origin. Cassiterite, columbite-tantalite (coltan), wolframite, tantalum, tin, tungsten and gold are not necessary for the manufacture or functionality of the Product.

European Directive 2002/95/EC (RoHS) and 2011/65/EC (ROHS II)

Caraustar does not intentionally introduce lead, cadmium, mercury or hexavalent chromium into the Product. The results of the most recent quarterly testing of paperboard produced at the Facility indicate that the sum of heavy metal concentration in the paperboard that was tested did not exceed 100 ppm.

Consumer Product Safety Information Act (CPSIA) of 2008

The Product is not intended to be a “children’s product,” defined as *a consumer product designed or intended primarily for children 12 years of age or younger*. Caraustar is a member of the Recycled Paper Technical Association (“RPTA”). The RPTA has an online white paper describing the Product’s safety protocol: <http://www.rpta.org>. Based on the results of RPTA testing protocol, we are pleased to inform you that the Facility’s paperboard that was most recently tested (i) had lead content levels below the 2011 standard of 100 ppm, and (ii) contained less than 0.1% of each of the banned phthalates listed in the CPSIA.

Safety Data Sheet (SDS)

Under OSHA regulations, an SDS is not required for manufactured “articles”. OSHA defines an “article” as a manufactured item: (I) which is formed to a specific shape or design during manufacture; (II) which has end use function (s) dependent on whole or in part upon its shape or design during end use; and (III) which under normal conditions of use does not release more than very small quantities, e.g. minute or trace amounts, of hazardous chemicals...and does not pose a physical hazard or health risk to employees. Under this definition, the Product is not subject to SDS requirements because all three conditions are met. The Product is a manufactured item which is formed to a specific shape. The function of paperboard in cartons, boxes, and other end uses is dependent on its shape for its usefulness. The Product does not appear to emit hazardous chemicals under conditions of its normal manufacture or what we understand to be its normal conversion to finished product.

Paperboard is further exempt from SDS requirements as a “wood product”. “Wood products are exempt from MSDS requirements because their primary hazard is flammability or combustibility, and because that hazard is unmistakable and obvious, it requires no further communication. OSHA has stated that “products such as lumber, plywood, and paper, are easily recognized in the workplace and pose a risk of fire that is obvious and well-known to the employees working with them”. Paperboard shares the relevant characteristics of these products.

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Ozone-Depleting Chemicals (ODC)

To our knowledge: (A) the Product is not manufactured with ODC, as defined in 40 CFR 82.104, and (B) the Product does not contain any of the listed Class I or Class II Ozone-Depleting Chemicals as identified in EPA's final rule 40 CFR Part 82.

California Transparency in Supply Chains Act of 2010

Caraustar complies with the laws regarding slavery and human trafficking of the country or countries in which the Product is manufactured. Caraustar complies with the disclosure requirements of the California Transparency in Supply Chains Act.

Corporate Practices

Caraustar does not authorize the giving, directly or indirectly, any money or object of value to any government or political official in connection with our supply of Product.

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Please be advised that although Caraustar manufactures the Product according to industry standards with respect to quality, recovered fiber is the primary raw material that Caraustar uses to manufacture the Product. Accordingly, notwithstanding any other provision in this certification to the contrary, it is always possible for contaminants to be present in the Product.

The liability of Caraustar shall be limited to the value of the applicable shipment or delivery of Product which directly resulted in a breach of the applicable certification.

Very truly yours,

William Doerr

Caraustar Industries Inc.