

November 5, 2025

Regulatory Statement

This statement covers the following UN packaging types:

1H1 1H1W 1H2 1A1 1A2 6HA1 31HA1 31HA1W 1G

Mauser Packaging Solutions Manufacturing Locations:

- Addison, IL (1H1,1H2,1H1W)
- Anniston, AL (31HA1)
- Atlanta, GA (31HA1)
- Charlotte, NC (1H1, 1H1W, 1H2, 1G, 31 HA1 inner receptacle)
- Chicago (1G; 1A1 and 1A2 new drums)
- Chillicothe (31HA1 and new inner receptacles)
- Clarkston (31HA1 and new inner receptacles)
- Conroe, TX (1H1, 1H1W, 1H2, 31HA1, 31HA1W)
- East Brunswick, NJ (1H1,1H1W, 1H2)
- Easton, PA (1G)
- Harrisburg, NC (1A1, 1A2)
- Geismar, LA (31HA1)
- Houston, TX (1A1, 1A2, 31HA1, 6HA1)
- Hutchins, TX (31HA1 inner receptacle)
- Lloydminster, Canada (new 1H1 and 1H2)
- Mason, OH (1A1,1A2)
- Mt. Vernon, OH (31HA1)
- North Wales, PA (31HA1 and new inner receptacles)
- Rancho Cucamonga, CA (1H1, 1H2, 31HA1 inner receptacle)
- Romeoville, IL (31HA1)
- Warren (1A1, 1A2)
- Woodbridge, NJ (1A1, 1A2, 6HA1)
- Burlington, ON (1A1, 1A2)
- Toluca, MX (31HA1)

The compliance status of the raw materials used in the manufacture of both UN rated and non-UN rated fiber drums, plastic drums steel drums, composite drums, composite Intermediate Bulk Containers (IBCs) and inner receptacles for IBCs follows.

Non-standard packaging produced by special order and/or with customer supplied components may be exempt from certain statements contained in this letter. Please review the following for exemptions that may apply to the containers you purchase.

Exemptions:

Recycled Material Content

The use of recycled plastics materials may render some of the statements contained herein invalid.

Poly drums manufactured with recycled resin under CA 2011030036 and composite IBCs manufactured under CA2023070504 do not currently meet FDA standards for food contact.



Non-Standard Additives

Non-standard additives requested by our customers, such as anti-stats, UV blockers, may alter disclosures provided in this letter depending upon the composition of the additive and the percentage used. Such additives will be reviewed and certified on a case-by-case basis.

Allergens: Our raw material and component suppliers have supplied information stating that their materials are not produced with allergens including shellfish, fish, crustaceans, mollusks, peas, peanuts and tree nuts, mustard and mustard derivatives, celery and celeriac derivatives, milk, lactose, lupine or derivatives, sesame seeds, derivatives or oils, eggs, soy, soy derivatives, sulfites, wheat, and gluten.

These allergens are not used in the manufacturing or processing of drums, IBCs or components in Mauser facilities. Mauser does not test or monitor for these allergens.

Further, latex is not used in the production of Mauser products.

Products of Animal Origin: Mauser Packaging Solutions does not use products of animal origin in the production of drums or IBCs.

BHA BHT: Butylated hydroxyanisole and butylated hydroxytoluene are primarily used as food preservatives. To the best of Mauser Packaging Solutions knowledge these materials are not an ingredient or an additive in the resins, steel, paints, linings, fiber, fiberboard, and coatings, and colorants or other additives in the manufacturing of its products.

Bioterrorism Preparedness and Response Act: Mauser Packaging Solutions is aware of the Public Health and Bioterrorism Preparedness and Response Act ("Bioterrorism ACT") of 2002 and the related FDA interim final rules on facility registration and prior notice published in October 2003. To carry out certain provisions of the Bioterrorism Act, FDA established regulations requiring that:

- Food facilities register with FDA, and
- FDA be given advance notice on shipments of imported food

Mauser Packaging Solutions is strictly a manufacturer of packaging and does not manufacture, package, distribute or store food or food-related products. Therefore, we have no registration responsibility under the above-mentioned act.

Bisphenols (Bisphenol A, Bisphenol B, Bisphenol F and Bisphenol S):

Bisphenols are not used in the production of polyethylene and are not intentionally added in the manufacture of Mauser Packaging Solutions plastic packagings.

Phenolic linings and rust inhibitors used in steel drums are not produced with BPA. Steel drum linings formulated with epoxy resins may contain unavoidable trace levels of BPA.

BSE/TSE/CWD/vCJD: Mauser Packaging Solutions drums and IBCs are not produced from, or with products made in association with animal by-products and are therefore not anticipated to contain any Bovine or other types of Spongiform Encephalopathy material.



Canada Division 23 Food Packaging Materials: In Canada, food packaging materials are governed by the Section B.23.001 of the Food and Drugs Act and Regulations. Under this legislation, it is the responsibility of the food seller (manufacturer, distributor) to ensure the safety of packaging material and compliance with the Section B.23.001 of the Food and Drugs Act and Regulations.

MPS does not add any substances that may be injurious to the health of the consumer or food. Furthermore, Mauser does not add polyvinyl chloride or octyltin chemicals during manufacturing of drums and IBCs.

CONEG / EU Heavy Metals/Toxics in Packaging Act: Several states have enacted legislation to limit the sum quantities of heavy metals (cadmium, lead, mercury, and hexavalent chromium) in packaging materials. In order to comply with this legislation, we provide this Certificate of Compliance. This Certificate of Compliance covers not only currently supplied items but also includes packaging materials that we may supply in the future.

Mauser Packaging Solutions certifies the following items are and will continue to be in compliance (unless otherwise notified in writing) with the requirements of:

1. No intentional addition of lead, cadmium, mercury, or hexavalent chromium.
2. TOTAL incidental amount of the above four metals does NOT exceed 100 ppm for each material listed.

Dimethyl Fumarate, Dimethyl Formamide, Dimethyl Furan (DMF): All these chemicals use the acronym DMF but they are not the same. Dimethyl furan is used as a biofuel. Dimethyl formamide is a plasticizer for acrylics and as a catalyst in pharmaceuticals and organic synthesis. Dimethyl fumarate is used as a fungicide for leathers. None of them have any application in the production of steel, fiber or plastics packaging and are not used in the manufacture of Mauser Packaging Solutions packaging or components and are not intentionally added.

Dioxane: 1,4-Dioxane is used primarily as a solvent in the manufacturing of industrial chemicals and as a laboratory reagent. It has no application in the production of Mauser packaging and not intentionally added.

EU Directives: Our resin suppliers have affirmed the product(s) they supply to Mauser Packaging Solutions for the manufacture of our plastic drums, composite steel drum liners, and composite IBCs meet one or more of the following European Union directives and/or directives of the relevant competent authority for that state

- Commission Regulation (EU) 10/2011 on plastic materials and articles intended to come in contact with food and all its Amendments including Commission Regulation (EU) 2017/752
- Framework Regulation (EC) No. 1935/2004 on materials and articles intended to come in contact with food.

Mauser Packaging Solutions maintains a raw material supplier documents in support of this certification but does not currently conduct an active testing program for chemical migration on its finished containers.

FDA – United States:

1. High Density Polyethylene of the types and grades used by Mauser Packaging Solutions for drums, plugs, lids accessories, and IBC inner receptacles are in compliance with 21 CFR § 177.1520
 2. Antioxidants and Stabilizers used in the resins are in compliance with § 178.2010 of 21 CFR.
 3. The standard EPDM/EPT, FKM, TPE, PTFE and ETFE gaskets comply with 21 CFR § 177.2600. Polyolefin gaskets are in compliance with § 177.1520.
 4. Fiber, paper, and fiberboard components are in compliance with 21 CFR
 5. Linings, coatings and seaming compounds used in steel drums are FDA compliant
 6. Colorants except for standard black are compliant with 21 CFR §178.3297
- Please note if FDA Black is required it must be ordered as FDA Black as the standard grade is not compliant.**

Food Safety Modernization Act (2011): The requirements outlined in Section 103 of FSMA (FFDCA Section 418) are applicable to all food facilities registered as required by Section 415 of the FFDCA. By regulation, the FDA has exempted packaging companies from the registration. Mauser Packaging Solutions does not presently maintain a proactive Foreign Supplier Verification Program (FSVP).

Fumigants, Pesticides, Preservatives: Mauser Packaging Solutions does not use fumigants, pesticides, preservatives, fungicides, etc. as a direct additive or processing aid in the manufacturing or processing of drums or composite IBCs. Pesticides as required by OSHA may be used in vermin control in the building and grounds.

Gluten: Gluten or gluten containing products are not intentionally used in the manufacture of Mauser Packaging Solutions drums or IBCs. This includes drums and components and accessories made of cold rolled steel, hot dipped galvanized steel, high density polyethylene, low density polyethylene, polypropylene, EDPM, Viton®, Santoprene®, polyolefin, silicone, Buna®, adhesives, polyurethane, natural rubber, paints, linings and coatings.

GMO : Genetically Modified Organisms are not used in the production of Mauser Packaging Solutions products.

Halal: Mauser Packaging Solutions unlined steel drums, plastic drums, composite drums and IBCs do not contain alcohol; natural L-cysteine extracted from hair or feathers; animal fats and/or animal extracts; bloods of any origins; blood plasma; pork; and/or other meat by products. Additionally, none of the of the components listed above are known by us to be present as impurities or by products in any of the ingredients used to make Mauser products. Finally, alcohol is not used as a processing aid, nor is it believed to be present as an impurity or by product in Mauser products.

Kosher: The raw materials and components used in the manufacture of Mauser Packaging Solutions drums and IBCs do not contain animal-based byproducts.



Selected MPS products are manufactured under Kosher supervision. Kosher certifications are renewed annually and can be provided upon request.

Latex: Latex is not used in the manufacture or processing Mauser Packaging Solutions products

Nitrates and Nitrites: Nitrates and nitrites are not used in the manufacture of Mauser Packaging Solutions drums and IBCs.

NSF (National Sanitation Foundation) Certification: NSF International is an organization that develops sanitation standards and food safety requirements. The organization is comprised of seven separate divisions which help draft industry and government standards and provide training, testing, and certification to those standards.

MPS's packagings are made from materials suitable for food contact use. However, there are presently no regulatory requirements for NSF certification of our containers.

Organic Certification/Organic Compliance. Mauser products are not certified organic. They are not made with GMOs or sewage sludge or animal wastes of any kind. They are not irradiated or a source of ionizing radiation.

Phthalates: Phthalates are used in a large variety of products, from enteric coatings of pharmaceutical pills and nutritional supplements to viscosity control agents, gelling agents, film formers, stabilizers, dispersants, lubricants, binders, emulsifying agents, and suspending agents. End-applications include adhesives and glues, agricultural adjuvants, building materials, personal-care products, medical devices, detergents and surfactants, consumer (retail) packaging, children's toys, modeling clay, waxes, paints, printing inks and coatings, pharmaceuticals, food products, and textiles. Phthalates are also frequently used in soft plastic fishing lures, caulk, paint pigments. Phthalates are used in a variety of household applications such as shower curtains, vinyl upholstery, adhesives, floor tiles, food containers and wrappers, and cleaning materials. Personal-care items containing phthalates include perfume, eye shadow, moisturizer, nail polish, liquid soap, and hair spray. They are also found in modern electronics and medical applications such as catheters and blood transfusion devices. The most widely used phthalates are the di-2-ethyl hexyl phthalate (DEHP), the diisodecyl phthalate (DIDP), and the diisononyl phthalate (DINP). DEHP is the dominant plasticizer used in PVC due to its low cost. Benzylbutylphthalate (BBP) is used in the manufacture of foamed PVC, which is mostly used as a flooring material. Phthalates with small R and R' groups are used as solvents in perfumes and pesticides¹.

This letter will serve to confirm that phthalates are not intentionally added in any MPS' plastics and fiber packagings or components. We do not monitor or test for substances not intentionally added. However, based on our knowledge of the raw materials, certain antistatic additives used in the outer layer of inner receptacle of composite IBCs may contain phthalates at levels not exceeding 0.1% per EU Regulation 1272/2008.

Further our suppliers of components, paints and coatings used in steel drum manufacturing affirm that to the best of their knowledge phthalates are not used in their linings and coatings and components used on Mauser steel drums.

¹ Source: Wikipedia July 28, 2020



The information provided is believed to be correct as of the date of this letter. Should there be any regulatory updates, we reserve the right to revise accordingly.

If you have any questions regarding the above information, please do not hesitate to contact me.

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