

Pregis Corporation**The brightest ideas in packaging.™**

Product Stewardship Office
8201 W. Elowin Court
Visalia, CA 93291
Telephone: (559) 651-0951 x101
Facsimile: (559) 651-2623
E-Mail: gallen@pregis.com

September 20, 2019

SAFETY DATA FOR CUSHION-PAK ABSORBENT PADS AND LINERS

We are pleased to respond to your request for Safety Data Sheets for Pregis Innovative Packaging, Inc.'s Cushion-Pak absorbent pads and liners.

The Occupational Health and Safety Administration's Hazard Communication Standard, which prescribes the use of Safety Data Sheets, exempts manufactured "Articles" from its requirements [29 CFR 1910.1200 (b)(6)(iv)].

This product conforms to the U.S. OSHA Hazard Communication Standard's definition of an "Article," i.e., "...a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in 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 a hazardous chemical, and does not pose a physical hazard or health risk to employees.

The Standard also exempts "Wood or wood products" from its Right-to-Know regulations [29 CFR 1910.1200 (b)(6)(iii)]. OSHA has stated that this category includes paper, which is the primary formulary component of Cushion-Pak products.

For the foregoing reasons, Pregis Innovative Packaging, Inc.'s Cushion-Pak absorbent pads and liners are exempt from the U.S. OSHA Hazard Communication Standard and we, therefore, are not equipped to provide Safety Data Sheets for those products.

All Cushion-Pak packaging and packaging components, manufactured in the United States by Pregis Innovative Packaging, Inc., comply with the several United States' enacted provisions of the Coalition of Northeast Governors ("CONEG") legislative model for the reduction of toxics in packaging and the California Toxics in Packaging Prevention Act. Pregis Innovative Packaging, Inc.'s manufacturing practices prohibit the intentional introduction of cadmium(Cd), hexavalent chromium(Cr ⁺⁶), lead (Pb), or mercury (Hg) into its products' formulations. Further, the cumulative total of all such metals' incidental concentrations does not exceed 100 parts per million (ppm).

Please maintain a copy of this letter for your records, as documentation of our products' status in this respect.

Thank you for your support of Pregis Innovative Packaging, Inc.'s Cushion-Pak absorbent padding and liner products.

Sincerely yours,



George Allen
Regulatory Affairs