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May 15, 2013

## Via Electronic Mail and U.S. Postal Service

Re: European Union Status of EcoPure D6000 When Used in Food-Contact Applications; Our File No. BI14159-01

The purpose of this letter is to respond to opinion regarding the status, under the laws and regulations of the European Union (EU), of EcoPure D6000 when used to manufacture articles that may contact food in the Member States of the EU. Specifically, we understand that EcoPure D6000 is a polymeric-based additive that will be blended at a maximum of 4% into resins that are otherwise approved for food-contact use. Based on the information on the composition of EcoPure D6000 that you have provided, we have no hesitation in advising that the product may properly be said to comply fully with the EU Framework Regulation (EC) No. 1935/2004 and Regulation (EU) No. 10/2011 (the Plastics Regulation).<sup>1</sup>

We understand that EcoPure D6000 as an additive that may help facilitate biodegradation of the plastic in an anaerobic environment, *e.g.*, a landfill. We note that our assessment is limited to the food-contact status of the EcoPure D6000 additive under the Framework Regulation (EC) No. 1934/2004 and the Plastics Regulation, and does not otherwise address the "biodegradability" status of polymers made with EcoPure, nor express any opinion as to the adequacy of the EcoPure D6000 product label with respect to any green marketing claims being asserted.

Washington, D.C.

Brussels

San Francisco

Shanghai

## KELLER AND HECKMAN LLP

Mr. John Lake May 15, 2013 Page 2

We trust that you will find this letter to be fully responsive to your request for our opinion. Should you have any questions, or if we may be of assistance in any other way, please do not hesitate to contact us.

Cordially yours,

Devon Wm. Hill