

Serving Business through Law and Science®

khlaw.com

202.434.4100

Keller and Heckman LLP 1001 G Street, NW Suite 500 West Washington, DC 20001

Writer's Direct Access Mark Thompson (202) 434-4252 thompson@khlaw.com

December 22, 2022

Via Electronic Mail

Mr. Ajay Krishnan Business Manager Saint-Gobain Boron Nitride 1 New Bond St, MS 525 Worcester, MA 01606

Re: MERCOSUR Status of Saint-Gobain's Boron Nitride; Our File No. PE12633-16

Dear Mr. Krishnan:

Saint-Gobain Boron Nitride ("Saint-Gobain"), a business unit within Saint-Gobain Advanced Ceramics Corporation, has requested our opinion regarding that status, under the laws and regulations administered by the Mercado Común del Sur ("MERCOSUR"), of boron nitride (CAS Reg. No. 10043-11-5) when intended for use as a processing aid in plastics that contact food. Specifically, we understand that Saint-Gobain's boron nitride product will be used as a processing aid in all polymer types.

Based on the information that you and your supplier have provided, we have no hesitation in providing our opinion that boron nitride may be used in the manner described above, and that such uses may be said to fully comply with MERCOSUR GMC Res. No. 39/19 ("Positive List of Additives for the Preparation of Plastic Materials and Polymeric Coatings that Come into Contact with Food"). We note that boron nitride (Ref. No. 40400) currently is the subject of an applicable listing in GMC Res. No. 39/19, and subject to a total specific migration limit (SML(T)) of 6 mg/kg, expressed as boron. In view of the information that Saint-Gobain has supplied to us concerning the composition of the boron nitride product, and provided that this SML(T) is met in the finished product, we have no hesitation in advising that the product may be used as intended in full compliance with MERCOSUR GMC Res. No. 39/19.

* *

*



Mr. Ajay Krishnan December 22, 2022 Page 2

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

Cordially yours, at 1 Comp

Mark Thompson