

Restricted Substance Control Declaration

August 23, 2024

Litco International, Inc. is the parent company of Inca Presswood-Pallets, Ltd. of Dover, Ohio and Sardis, Mississippi. To assist the customers of Litco International, Inca Presswood-Pallets, Ltd. is supplying the following information pertaining to the molded wood products offered by Inca Presswood-Pallets, Ltd.

The products are produced from wood generated by local wood suppliers and include whole tree chips, sawmill waste chips and some wood waste generated by local manufacturers. All wood processed at the Inca facility is reduced to a small flake and dried to a moisture content of less than 4 percent prior to the presswood manufacturing. The Inca process is considered ISPM 15 compliant and no heat treating is required.

Directive 2002/95/EC, RoHS 2015/863/EU and other Heavy Metals

We certify that all packing and packaging components comply with the requirements of this law; namely that the maximum proposed concentration for any of the following substances is 0.1% or less.

Lead (Pb)
Mercury
Cadmium (.01% concentration)
Hexavalent Chromium
Bromine-containing flame retardants
PBB (polybrominated biphenyls)
PBDE (polybrominated diphenyl ethers)
Bis (2-ethylhexyl) phthalate (DEHP) (0.1%)
Benzyl butyl phthalate (BBP) (0.1%)
Dibutyl phthalate (DBP) (0.1%)
Diisobutyl phthalate (DIBP) (0.1%)

We further certify that in all cases where the regulated metals are present at levels below the schedule stated above, the regulated metals were not intentionally added during the manufacturing process.

Directive 1907/2006 (REACH)

REACH (Registration, Evaluation, and Authorization of Chemicals under the European Packaging Directive 76/769/EEC)

REACH has identified a list of Substances of Very High Concern (SVHC) which has been updated on June 27th, 2024 and has 241 substances. We certify that no chemical found in the SVHC list is used in the process to produce Inca Presswood products, with the exception of formaldehyde which is below the 0.1% (by weight) threshold as determined by REACH. We do not add any of the recently added substances referenced in the list. REACH has a separate list of chemicals under ANNEX 14 which are allowed in products as long as the importer has authorization from the EU. Inca certifies that no chemical is used in the process to produce Inca presswood products with the exception of formaldehyde which is below the 0.1% (by weight) threshold as determined by REACH.

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REACH has a separate list of chemicals under ANNEX 17. We certify that no chemical is used in the process to produce Inca presswood products.

Fungicides

We certify that no fungicides including tribromophenol are involved in the process to produce the Inca presswood products.

Conflict Minerals/Dodd-Frank Act

The minerals regulated by the Dodd-Frank Wall Street Reform and Consumer Protection Act are not intentionally added to the products produced by Inca Presswood-Pallets, Ltd.

VOC's (Volatile Organic Compounds)

In reference to VOC'S (Volatile Organic Compounds), TBA and TBP, please find the following information:

We certify that no bromated phenols including 2, 4, 6-tribromoanisole (TBA) or 2, 4, 6-tribromophenol (TBP) or methyl bromide (MB) are involved in the process to produce Inca presswood products.

The urea formaldehyde (U.F.) formulated resin used in the manufacture of our presswood pallets and core plugs is the same as used in the manufacture of particle board and medium density fiberboard.

Though the formulated resin is not considered a VOC, any residual off-gassing of formaldehyde from the finished product is considered a VOC. However, the amount of formaldehyde off-gassed from the product is extremely small and rapidly diminishes significantly within 24 hours after the production of a presswood product.

CARB (California Air Resources Board)

The presswood products produced by Inca Presswood are considered packaging materials and are exempt from CARB regulations.

Packaging Materials

We certify that products manufactured by Inca Presswood Pallets, Ltd. do not contain Class I or Class II substances as listed in 40 CFR part 82, appendix A as listed below.

(a) Class I substance means any substance designated as class I in 40 CFR part 82, appendix A to subpart A, including chlorofluorocarbons, halons, carbon tetrachloride and methyl chloroform and any other substance so designated by the Agency at a later date.

(b) Class II substance means any substance designated as class II in 40 CFR part 82, appendix A to subpart A, including hydrochlorofluorocarbons and any other substance so designated by the Agency at a later date.

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The products supplied by Inca Presswood-Pallets, Ltd. does not contain as intentionally added additives or ingredients any of the following substances:

Cadmium (Cd) and cadmium compounds
Lead (Pb) and lead compounds
Mercury (Hg) and mercury compounds
Hexavalent chromium (Cr6+) and hexavalent chromium compounds
Cobalt dichloride
Halogenated organic compounds and flame retardants, including
Polybrominated Diphenyl Ethers (PBDE)
Polybrominated biphenyls (PBB)
Tetrabromobisphenol-A-bis-(2,3-dibromopropyl ether) (TBBP-A-bis)
Halogen-free phosphorus based organic flame retardants
Allergenic and sensitizing substances restricted from use in toys
Organochlorine compounds including
Polychlorinated biphenyls (OCB)
Polychlorinated naphthalene (chlorine number 3 and above)
Polychlorinated terphenyls (PCT's)
Chloroparaffins (CP)
Mirex
Phthalates, including DINP, DIDP, DNOP, DNHP, and
Bis(2-ethylhexyl) phthalate (DEHP)
Butyl benzyl phthalate (BBP)
Dibutyl phthalate (DBP)
Diisobutyl phthalate (DIBP)
Persistent bioaccumulating toxics and very persistent and very bioaccumulating substances banned or restricted per REACH and 850/2004
Perfluorooctanic acid (PFOA)
Pentachlorophenol
Toluenediisocyanate (TDI)
Methyl isocyanate (MIC) and materials emitting MIC during use
Aromatic amines
Halogenated organic phosphorus compounds
Antimony and its compounds
Nanomaterials and materials containing nanomaterials
Bisphenol A (BPA) and its derivatives (monomeric)
Bisphenol S (BPS) and its derivatives
Substances on the SIN-list not already covered otherwise
Endocrine disrupting substances banned or restricted by REACH and 2009/425
Asbestos
Azo dyes and colorants
Chlorinated solvents including carbon tetrachloride and 1,1,1-trichloroethane
Methyl bromide
Polyvinyl chloride (PVC) and PVC mixtures
Radioactive substances

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Perfluoro octane Sulfonates (PFOS) and its salts
Hydrofluorocarbons
Benzotriazole
Beryllium oxide and beryllium copper
Biocides, triclosan, dimethyl fumarate (DMF), and silver and silver compounds
Organotin compounds including bistributyltin oxide (TBTO), tributyltins (TBT) and triphenyltins (TPT)
Latex
Silicone
Genetically Modified Crops and Organisms
Cyanuric Acid

Polyfluoroalkyl substances (PFAS)

Associated Companies involved with the Declaration:

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Manufacture of Presswood Products

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Manufacture of Presswood Products

Declaration Prepared by:

Dale R. Hart: Vice President, Inca Presswood-Pallets, Ltd.