



Dennis M. Keefe, Ph.D.
Director, Office of Food Additive Safety
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
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Reinach, July 17th, 2020

Commitment

Dear Dr. Keefe:

The purpose of this letter is to confirm that Archroma Management GmbH (“Company”) will, as of December 31, 2023, voluntarily cease introduction into interstate commerce and delivery for introduction into interstate commerce, and will not thereafter introduce into interstate commerce or deliver for introduction into interstate commerce, the products authorized by Food Contact Notification (FCN) No.1493 for any use in food-contact applications in the United States and subject to the jurisdiction of the United States Food and Drug Administration (FDA). The Company will, as of January 1, 2021, begin to phase-out the introduction into interstate commerce and delivery for introduction into interstate commerce the products authorized by the above-listed FCNs for use in food-contact applications in the United States. Additionally:

1. Beginning with 2021, the Company will provide FDA with annual updates, to be provided by January 31st of the following year, on progress towards the above commitments, as well as an interim update in 2023, to be provided by July 31st of that year. Information to be provided will include the annual market volume of these products sold for use in food-contact applications in the United States. The Company will also provide similar information from 2019 for historic comparison purposes.
2. The Company agrees to provide an analytical sample for each food contact substance authorized by the above-referenced FCNs that are still commercialized so that FDA may monitor the prevalence of these materials in the marketplace. Analytical samples will include the product as sold by the Company to its downstream customers, and when available, samples of the product applied to paper and/or paperboard, and the food contact substances as applied in a finished food contact article used for food packaging.
3. Based upon the Company’s experience and belief, it is expected that the large majority of any existing stocks of the Food Contact Substances (FCSs), paper and paperboard in which the FCSs are a component, and food packaged in paper in which the FCSs are a component, held by companies further down the supply chain from the Company, will



be exhausted within 18 months of the cessation of initial introduction into interstate commerce.

The Company acknowledges that FDA may, in its discretion, amend the Inventory of Effective Food Contact Notifications with respect to the FCNs listed above to reflect the commitments of this letter.

The undersigned is authorized to make these representations and commitments on behalf of the Company. This letter and the representations and commitments contained herein are and will continue to be binding on the Company and its successors and assignees of any rights or obligations with respect to products which are subject to the FCNs listed above.

Yours sincerely,

Archroma Management GmbH

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Carole Mislin
Head of Product Stewardship

A grey rectangular box redacting the signature of Silke Wischeropp.

Silke Wischeropp
General Counsel
Site Manager Switzerland