

July 2024

Compliance Statement

UK REACH / REACH (EC) 1907/2006

SVHC (substances of very high concern)

BACKGROUND

EU Regulation (EC) 1907/2006 otherwise known as REACH (Registration Evaluation and Authorisation of Chemical substances) came into effect on June 1st, 2007. REACH places responsibility on industry to manage the risk from chemicals and to provide safety information on those substances in order to protect human health and the environment. REACH requires registration with the European Chemicals Agency (ECHA) for all substances manufactured within or imported into the European Union.

REACH regulations apply to any chemical substance, either individually or in combination or contained within any manufactured article¹ e.g. paper, cardboard, packaging or pressure sensitive adhesive labelstock as supplied by and defined as articles¹ in accordance with REACH legislation.

UK REACH / REACH (EC) DIVERGANCE and CONTINUED COMPLIANCE

After the UK BREXIT / EU withdrawal transition period ended REACH (EC) regulations were incorporated into UK law under the European Union (withdrawal) act on January 1st, 2018, and became known as UK REACH.

REACH (EC) and related legislation were initially replicated in UK REACH aside from required changes to make UK REACH operable in a domestic context. The REACH statutory instruments that made those required changes can be viewed at [Legislation.gov.uk](https://www.legislation.gov.uk).

Key principles of the original EU REACH regulations were retained in UK REACH.

UK REACH and REACH (EC) now have two completely separate legal systems and operate entirely independently of one another. continues to take all necessary steps to remain compliant with both forms of REACH. This is achieved by maintaining regular open dialogue with raw material suppliers and insisting of their continued compliance with both REACH legislations and ECHA SVHC candidate lists within the materials converted / incorporated into product sold by .

ARTICLE STATUS and safety – PRESSURE SENSITIVE ADHESIVE LABELS

Pressure sensitive adhesive label product as supplied by _____, is by definition within REACH legislation classified as an “article”¹ and therefore **does not require either an MSDS (material safety data sheet) or directly be required to be a controlled item under current REACH regulations.**

Label products as provided and manufactured by _____ are not intended for or designed for prolonged or repetitive short-term contact with human skin or for ingestion or oral cavity contact under any normal or reasonably foreseeable conditions of use.

Therefore Label products as manufactured by _____ are safe products in accordance with article 3 of the materials description given in Regulation (EU) 2023/988, General product safety, repealing directive 2001/95/EC, and do not come under the scope of Regulation (EU) 1272/2013 Polycyclic aromatic hydrocarbons (PAHs).

2015 amendment to article status

The Court of Justice of the European Union ruled on 10th September 2015 in clarification of the definition of what constitutes an “article”¹.

The threshold limit of 0.1% w/w of inclusion into an article of any listed SVHC item (see below) before declaration of such now applies to each individual component “article”¹ which may be a part of a larger whole. In the case of pressure sensitive adhesive label laminate this means our product is now composed of Two articles¹.

- Face paper and or synthetic face material and the adhesive are a single article¹
- Release liner and silicone coating are also a single article¹

¹ *“Article” is a legal term under REACH and is defined as “an object which during production is given a special shape or design which determines its function to a greater degree than does its chemical composition.*

LISTING OF SVHC and OBLIGATIONS

The European Chemicals Agency (ECHA) website lists “candidate substances” as designated by the ECHA member states committee including substances of very high concern (SVHC).

_____ continue to maintain regular dialogue with supplier mills to ensure their continued obligation for notification regarding SVHC under REACH Article 7, where any SVHC be present in concentrations of > 0.1% w/w.

The “candidate list of substances” was at the date of this statement last updated on June 27th, 2024.

SVHC DECLARATION

With regard to pressure sensitive adhesive labelstock (PSAL) and release liner (RL), _____ require their individual component raw material suppliers provide written confirmation that their obligations, as defined within REACH are fulfilled pursuant to regulations published by ECHA.

Substances used by mills who include pulp production as part of their manufacturing process have registered the following substances with ECHA

Calcium Oxide	No 01-2119475325-36-0109
Chlorine Dioxide	No 01-2119492305-37-0010
Black Liquor	No 01-2119541681-41-0004
Green Liquor	No 01-2119539462-39-0001
White Liquor	No 01-2119582793-25-0006

declare as the converter of pressure sensitive adhesive labelstock laminate (incl. adhesives and release liners) after consultation with supplier mills, that no known SVHC candidate list substance in a concentration of greater than the 0.1% w/w threshold are present or used in any **process**.

Exception

do not use any restricted SVHC items in any of our processes. In addition, no restricted items are present in a concentration greater than 0.1% w/w in any mill manufactured pressure sensitive adhesive label stock, **with the exception of**

4.4' – Sulfonyldiphenol (Bisphenol S*), CAS No. 80-09-1

Used in the manufacture of direct thermal (heat) reactive label papers and tag stock, most commonly

Thermal direct Economy (E) BPA free

Thermal topcoat STC BPA Free

Thermal topcoat FB BPA Free

The presence of this candidate substance (Bisphenol S*) currently has no direct legal impact, neither in use, in the production of an article or marketing & usage of any article featuring the aforementioned product (Bisphenol S*). As part of a chain potentially supplying the products listed above (fig 1) We / you are obliged to make the respective information available in accordance with article 33 of REACH / UK REACH regulations.

* are in contact regularly with raw material suppliers. As of the date of this declaration "Bisphenol S" continues to be investigated by ECHA / UK reach for general safety compliance and health concerns but is not currently included on any restricted items list.

will continue to notify our customers and update this declaration as necessary.

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