

## UPM Raflatac compliance statements for Europe

### Safety and opportunity through proactive regulatory and legislative observance

UPM Raflatac actively complies with and anticipates applicable laws and regulations to ensure that our raw materials, semi-finished products and final products are as safe as they can be – for the environment, everyone in the manufacturing and supply chains and consumers.

We view legislative change and consumer concerns positively, as a continual source of opportunity for the creation of new business and new product solutions.

In this document, we have compiled regulatory and legislative statements of compliance relating to all UPM Raflatac products in Europe.

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### Allergens

UPM Raflatac does not add the following food allergens as listed in Annex II of Regulation (EU) No 1169/2011 article 9:

- |                              |                                   |
|------------------------------|-----------------------------------|
| 1. Cereals containing gluten | 8. Nuts                           |
| 2. Crustaceans               | 9. Celery                         |
| 3. Eggs                      | 10. Mustard                       |
| 4. Fish                      | 11. Sesame seeds                  |
| 5. Peanuts                   | 12. Sulphur dioxide and sulphites |
| 6. Soybeans                  | 13. Lupin                         |
| 7. Milk                      | 14. Molluscs                      |

Please note that Regulation (EU) No 1169/2011 is explicitly for food and ingredients in food and is not concerning food packaging material.

This information is provided based on our knowledge of label stock raw materials and processing, review of material safety data sheets, and limited supplier surveys. Please note that we have not tested our products to confirm the presence or absence of these substances.

UPM Raflatac manufacture self-adhesive label stock for use by label converters, the laminate is designed to be used only for labelling products and is not intended for consumption.

### Aromatic amines

Aromatic amines are not used in the manufacture or formulation of UPM Raflatac products.

### Asbestos

Asbestos is not used in the manufacture or formulation of UPM Raflatac products.

### Animal Content

Animal parts are not used by UPM Raflatac as additives, in the self -adhesive laminates which we manufacture.

Further up the supply chain some products may contain one or more additive(s)/substance(s) synthesized from animal extracts - that is, the hydrolysis of animal fats (tallow) into fatty acids.

Please note that the animal sourced raw materials have been chemically altered from their original structure and have undergone significant chemical processing and are therefore considered synthetic.

Our supply chain has also confirmed that all ingoing components which may be based on tallow are in strict compliance with the requirements of Regulation (EC) 1069/2009 and its amendments regulating the use of material presenting risks as regards Transmissible Spongiform Encephalopathies (TSE).

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### Biocides

The Biocidal Products Regulation (EU) No 528/2012 covers both the biocidal products and the articles treated with biocidal products. For treated articles, the Regulation requires labelling of the article as of September 1<sup>st</sup>, 2013 if a biocidal function or property is claimed or if the approval of the used biocidal active substance requires labelling of the article.

Small amounts of biocidal products are mixed into some of the raw materials used in UPM Raflatac self-adhesive laminates to prevent microbial growth during storage or processing. Since the biocide has not been used with the intention to still have a biocidal function or property in the finished goods (self-adhesive laminate) and it is only a residue from the production phase, the article is exempt from the treated article requirements.

### Bisphenol A (BPA) and Bisphenol S (BPS)

UPM Raflatac does not use Bisphenol A and Bisphenol S in the manufacture of self-adhesive label-stock and associated products either as a raw material or as an additive, with the exception of particular direct thermal faces and thermal boards.

Information regarding products containing Bisphenol A can be found in a separate statement [here](#). European Union Regulation (EU) 2016/2235, which is an amendment to the REACH Annex XVII restricted substances list means that direct thermal paper with concentrations of Bisphenol A (BPA) above 0.02% in weight will be banned in Europe after January 2, 2020.

### Conflict minerals, Regulation (EU) 2017/821

UPM Raflatac does not intentionally add any tantalum, tin, tungsten or gold from suppliers who use ores sources from the Democratic Republic of Congo or adjoining conflict-affected or high-risk areas, in our manufacturing process. This information provided is based on our knowledge of label stock raw materials and processing, review of material safety data sheets, and supplier surveys.

### Dimethyl fumarate (DFM)

UPM Raflatac does not use dimethyl fumarate, DMF (CAS No 624-49-7) in the manufacture of the self-adhesive laminates either as a raw material or as an additive.

### Perfluorooctane sulfonates (PFOS)

Perfluoroalkyl compounds, including perfluoroalkyl sulfonates such as perfluorooctane sulfonate (PFOS), fluorotelomers, telomere-based polymeric substances and perfluorooctanoic acid (PFOA) are not used or added by UPM Raflatac's raw material suppliers or by UPM Raflatac in the manufacture of self-adhesive laminate.

### Epoxy derivatives

EU Regulation (EC) No 1895/2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food is not applicable to UPM Raflatac self-adhesive laminates. The regulation deals with coatings mainly in cans and metal closures, with restrictions for:

2,2-bis (4-hydroxyphenyl) propane bis (2, 3-epoxypropyl) ether, BADGE (CAS No 001675-54-3),

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and some of its derivatives;

Bis (hydroxyphenyl) methane bis (2, 3-epoxypropyl) ethers, BFDGE (CAS No 039817-09-9), other novolac glycidyl ethers, NOGE.

### Formaldehyde

Formaldehyde is not intentionally used as a raw material in the manufacture of self-adhesive laminate and associated products by UPM Raflatac or by our raw material suppliers.

### Heavy metal content

European Commission Directive 94/62/EC and Coalition of North-eastern Governors' (CONEG, US) both require no intentional addition of lead, cadmium, mercury or hexavalent chromium to packaging or packaging components. Furthermore, the sum concentration of these metals due to incidental introduction into packaging or packaging components must not exceed 100 parts per million (ppm).

UPM Raflatac does not intentionally add lead, cadmium, mercury or hexavalent chromium to self-adhesive laminates. UPM Raflatac has not performed any laboratory analysis self-adhesive laminate to determine the absence or presence of these substances. Based on our knowledge of label-stock processing, raw materials, review of available safety data sheets, and supplier survey information we have no reason to suspect any UPM Raflatac products contains a sum concentration of these heavy metals greater than 100 ppm.

### Ozone-depleting chemicals

UPM Raflatac does not add the ozone-depleting substances listed below in the manufacturing processes of any of our factories. Thereby, all products we supply are free of the substances listed. Should any of these substances exist as traces in our raw materials or are generated during the manufacturing process, their content is negligible.

1,1,1-trichloroethane CAS No 71-55-6  
Carbon tetrachloride CAS No 56-23-5  
Halons  
HCFCs

Bromochloromethane CAS No 74-97-5  
CFCs  
HBFCs  
Methyl bromide CAS No 74-83-9

## Packaging waste, European standards EN 13427-13432

These European Norms are designed to provide compliance with various aspects of Directive 94/62/EC on Packaging and Packaging waste.

### EN 13427 Packaging – Requirements for the use of European Standards in the field of packaging and packaging waste.

This European standard provides the requirements and procedures for applying the EN13428 - 13432 packaging standards.

### EN13428 Packaging – Requirements specific to manufacture and composition – Prevention by source reduction

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UPM Raflatac is continually developing products to help minimize packaging by reducing the grammage of materials. However, this is only possible, provided that these materials' required technical properties are maintained.

Concerning Annex C for the assessment of dangerous substances, self-adhesive laminate does not contain substances dangerous to the environment, and if any are present these would be trace amounts and their content negligible. Therefore, the minimization of dangerous substances is not applicable to our products.

### **EN13429 Packaging – Reuse**

UPM Raflatac manufactures self-adhesive laminate for use as labels; it is not designed for reuse as labels.

### **EN13430 Packaging – Requirements for packaging recoverable by material recycling**

A label usually becomes an integral part of the product to which it is applied. It is therefore important that both the packaging design and choice of label take into account the use of compatible materials for recycling. For example, polythene containers should use PE or PP face materials.

### **EN13431 Packaging – Requirements for packaging recoverable in the form of energy recovery**

Self-adhesive laminates can be used as an alternative source of fuel in conjunction with energy recovery. UPM Raflatac self-adhesive laminates provide an excellent source of fuel – they have very low levels of heavy metals and have a calorific value in the region of 20MJ/kg with an ash content of approximately 5%.

### **EN13432 Packaging – Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging**

The adhesives used by UPM Raflatac for self-adhesive applications have not been tested in accordance to EN13432 for composting and biodegradation. Further information regarding composting and biodegradation is available on request.

## **Persistent Organic Pollutants (POPs) Regulation (EC) No 850/2004 (including amendment Regulation (EU) 2016/460)**

UPM Raflatac do not add these substances listed below in the manufacturing processes of any of our factories. Thereby all products we supply are free of these substances listed. Should any of these substances exist as traces in our raw materials or are generated during the manufacturing process, their content is negligible.

Tetrabromodiphenyl ether	Hexachlorocyclohexanes	Pentachlorobenzene
Pentabromodiphenyl ether	Dieldrin	PCB
Hexabromodiphenyl ether	Endrin;	Mirex
Heptabromodiphenyl ether	Heptachlor	Toxaphene
PFOS	Hexachlorobenzene	Hexabromobiphenyl
DDT	Chlordecone	Hexabromocyclododecane (HBCDD)
Chlordane	Aldrin	

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This information is based upon our knowledge of label-stock processing and raw material, review of material safety data sheets, and supplier surveys. Please note we have not performed any laboratory analysis to confirm the absence or presence of any of the substances listed above.

### Polycyclic aromatic hydrocarbons (PAHs) Regulation (EU) No 1272/2013

UPM Raflatac products are not designed or intended for direct as well as prolonged or for short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use. Therefore, our products do not come under the scope of the Regulation (EU) No 1272/2013.

None of the eight listed polycyclic aromatic hydrocarbons (PAHs):

Benzo[a]pyrene,  
Benzo[e]pyrene,  
Benzo[a]anthracene,  
Chrysen,  
Benzo[b]fluoranthene,  
Benzo[j]fluoranthene,  
Benzo[k]fluoranthene and  
Dibenzo[a,h]anthracene,

are used in UPM Raflatac's manufacture of self-adhesive label-stock either as an additive or as a raw materials. Based on information from our raw material suppliers we have no reason to suspect that any UPM Raflatac products contain PAHs listed in the regulation above the limits.

### Phthalates

Based on information from our raw material suppliers we can confirm that the self-adhesive laminates and associated products complies with the phthalates as listed in Regulation (EC) No 552/2009 (amending REACH Regulation (EC) No 1907/2006 regarding Annex XVII) for use in toys and childcare products and with the US Consumer Product Safety Improvement Act, Section 108, which has the same substances and limits:

Bis (2-ethylhexyl) phthalate	(DEHP)	CAS No 117-81-7
Dibutyl phthalate	(DBP)	CAS No 84-74-2
Benzyl butyl phthalate	(BBP)	CAS No 85-68-7
Di-'isononyl' phthalate	(DINP)	CAS No 28553-12-0 and 68515-48-0
Di-'isodecyl' phthalate	(DIDP)	CAS No 26761-40-0 and 68515-49-1
Di-n-octyl phthalate	(DNOP)	CAS No 117-84-0

### PVC / PVdC

Halogenated organic compounds such as Polyvinyl chloride (PVC) and Polyvinylidene chloride (PVdC) are not used by UPM Raflatac's European factories in the manufacture of standard self-adhesive laminate roll stock, nor are they used or added by any of our raw material suppliers.

The exceptions are particular specialist products that use PVC as a label face material or filmic products coated with PVDC. These products are clearly identified in either the product name and/or as stated on the relevant technical information sheets.

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### REACH, EU Regulation (EC) No 1907/2006

UPM Raflatac self-adhesive laminates and associated products conform to the regulations in REACH. Self-adhesive laminates are classed as “articles” under REACH.

UPM Raflatac continues to meet the requirements for notification regarding substances of very high concern (SVHC) under Article 7 in REACH legislation, should any SVHC be present in concentrations greater than 0,1% (w/w).

Information regarding SVHC’s in UPM Raflatac products can be found in a separate statement [here](#).

UPM Raflatac does not intentionally add any substances included on the REACH Annex XVII “List of Restrictions” to self-adhesive laminates and associated products and we have no reason to suspect any of these substances are present in the product above allowable regulatory levels. With the exception of particular direct thermal faces and thermal boards. European Union Regulation (EU) 2016/2235, which is an amendment to the REACH Annex XVII restricted substances list means that thermal paper with concentrations of Bisphenol A (BPA) above 0.02% in weight will be banned in Europe after January 2, 2020.

### Recycled materials

The recycled content of the material for standard products is 0%. They are made from virgin material/fibres with the exception of particular products which are clearly identified on the relevant technical information sheets.

### RoHS, Directive 2011/65/EC (including Delegated Directive (EU) 2015/863)

The Directive 2011/65/EU (known as RoHS2) of July 21, 2011 and Commission Delegated Directive (EU) 2015/863 (RoHS3) of March, 31 2015 amending Annex II to Directive 2011/65/EU established maximum concentration values for 10 restricted substances in electrical and electronic equipment (EEE) placed on the market in EU member states.

RoHS restricted substances and their maximum allowable concentration values by weight in homogeneous materials include:

- Lead (0.1 %)
- Mercury (0.1 %)
- Cadmium (0.01 %)
- Hexavalent chromium (0.1 %)
- Polybrominated biphenyls (PBB) (0.1 %)
- Polybrominated diphenyl ethers (PBDE) (0.1%)
- Bis(2-ethylhexyl) phthalate (DEHP) (0.1%)
- Benzylbutyl phthalate (BBP) (0.1%)
- Dibutyl phthalate (DBP) (0.1%)
- Diisobutyl phthalate (DIBP) (0.1%)

UPM Raflatac does not intentionally use the RoHS restricted substances and has no reason to suspect that these substances are present in our self-adhesive label stock at levels above the allowable concentrations. This statement is made based on information from our raw material suppliers and our knowledge of label-stock raw materials and processing.

UPM Raflatac has not conducted laboratory analysis to determine the presence or absence of RoHS regulated substances in our products.



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### Timber Regulations, Regulation (EU) No 995/2010

UPM Raflatac meets the compliance obligations of EU Timber Regulations.

The Regulation is designed to combat the trade in and harvesting of illegal timber and bans companies from placing illegally harvested timber or timber products on the market.

In the regulation, companies that first place timber or timber products on the European market are referred to as "operators". Companies, which buy or sell timber or timber products already placed on the EU market, are referred to as "traders".

UPM Raflatac acknowledges its role as a "trader" and an "operator" within the EU Timber Regulation and has taken all appropriate actions to comply with its requirements. "Traders" are required to keep basic traceability information, indicating from whom they purchase and to whom they sell their products. As an operator UPM Raflatac has a Due Diligence System (DDS) in place, which includes all the elements which are clearly outlined in Article 6 of the Regulation.

### General product safety, EC Directive 2001/95/EC

Laminates manufactured by UPM Raflatac are safe products in accordance with the materials description given by EC Directive 2001/95/EC of the European Parliament and of the Council of 3<sup>rd</sup> December 2001, Article 2.

UPM Raflatac is a supplier of self-adhesive laminate stock and according to REACH these are classed as articles and therefore do not require Material Safety Data Sheets (MSDS). European Chemical Agency (ECHA) on the "Guidance on the Compilation of Safety Data Sheets" Version 3.1 dated November 2015 states: "SDSs do not have to be provided for articles" (1.General Introduction 1.1 The Safety Data Sheet).

CLP-Regulation (classification, labelling and packaging) EC No 1272/2008 is primarily concerning the labelling and handling of chemicals and mixtures used in the raw materials to manufacture self-adhesive label-stock and associated products and to a lesser extent to the finished article.

Substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR) – category 1A or 1B and 2 listed in CLP-Regulation are not used in the manufacture of label-stock products which are intended for food labelling applications. (unless substances or components are already regulated in the Union list of Regulation (EU) No.10/2011).

**Disclaimer:**

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