



2021-02-04

European compliance statements for UPM Raflatac

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.

Table of Contents

| | |
|--|---|
| Aromatic amines | 2 |
| Asbestos | 2 |
| Animal Parts..... | 2 |
| Biocides, Regulation (EU) No 528/2012 (BPR) | 3 |
| Bisphenol A (BPA) and Bisphenol S (BPS) | 3 |
| California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65) | 3 |
| Cobalt | 3 |
| Conflict minerals, Regulation (EU) 2017/821 | 3 |
| Dimethyl fumarate (DMF) | 3 |
| Perfluorooctane sulfonates (PFOS)..... | 4 |
| Epoxy derivatives | 4 |
| Formaldehyde..... | 4 |
| Heavy metal content | 4 |
| Oxo-degradable materials | 5 |
| Ozone-depleting chemicals | 5 |
| Packaging waste, European standards EN 13427-13432..... | 5 |
| Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 | 6 |
| Polycyclic aromatic hydrocarbons (PAHs) Regulation (EU) No 1272/2013..... | 6 |
| Phthalates..... | 7 |
| PVC / PVdC | 7 |
| REACH, EU Regulation (EC) No 1907/2006 | 7 |
| Recycled materials..... | 8 |
| RoHS, Directive 2011/65/EC (including Delegated Directive (EU) 2015/863)..... | 8 |
| Timber Regulations, Regulation (EU) No 995/2010..... | 8 |
| General product safety, EC Directive 2001/95/EC..... | 9 |
| Summary of changes | 9 |



2021-02-04

European compliance statements for UPM Raflatac

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 Parts

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

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

Please note that the animal sourced raw materials typically 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).



2021-02-04

European compliance statements for UPM Raflatac

Biocides, Regulation (EU) No 528/2012 (BPR)

The Biocidal Products Regulation (EU) No 528/2012 (BPR) covers both the biocidal products themselves and the treating of the final article to be placed on the EU market with the intention to still have a biocidal function or property. According to the BPR a “*treated article*” is an article that is “*treated with, or intentionally incorporates, a biocidal product*”.

UPM Raflatac’s role and that of the supply chain is to ensure that the active substance supplier (or the product/substance importer) is included in the list referred to in Article 95 of the BPR.

Small amounts of anti-microbial additives may be mixed into some of the raw materials by UPM Raflatac and other label stock component suppliers further up the supply chain to prevent microbial growth during storage or processing. The biocides are only a residue from the production phase and are not intended to still have a biocidal function or property in the finished goods (self-adhesive laminate). Therefore, self-adhesive laminates are not classed as “*treated articles*” and the provisions in the BPR concerning the final article do not apply to self-adhesive laminate.

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. Please note that some direct thermal faces and thermal boards may contain Bisphenol S.

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65)

The California Safe Drinking Water and Toxic Enforcement Act of 1986, otherwise known as Prop 65, is a risk-based regulation that requires a consumer warning for the potential exposure to a listed substance in the state of California. UPM Raflatac’s self-adhesive labels are semi-finished products that are typically used as a component of a packaging system. Generally, UPM Raflatac does not suspect exposures to Prop 65 substances at levels requiring a warning from reasonably anticipated end uses of the products. UPM Raflatac’s Prop 65 risk assessments are product specific, and as such, are addressed on a case-by-case basis. Please contact your customer service representative if you require a product specific statement.

Cobalt

UPM Raflatac does not intentionally add cobalt in the manufacture of self-adhesive label-stock and associated products either as a raw material or as an additive and as such, has no reason to suspect it to be present in our products other than trace amounts that are ubiquitous in nature.

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 (DMF)

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



2021-02-04

European compliance statements for UPM Raflatac

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 and associated products.

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 and associated products. 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), 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).

Third-party laboratory analysis of various UPM Raflatac label stock products representative of its product range indicates the sum concentration of these metals is less than 100 ppm.

Typical concentrations found in UPM Raflatac products are:

- Lead less than 2 ppm
- Cadmium less than 2 ppm
- Mercury less than 2 ppm
- Hexavalent chromium less than 2 ppm

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



2021-02-04

European compliance statements for UPM Raflatac

Oxo-degradable materials

The Directive (EU) 2019/904 of 5 June 2019 known as the Single-Use Plastics Directive (SUPD) includes the prohibiting of oxo-degradable plastics being placed on the market (Article 5). This directive must be translated into national legislation on this topic by July 2021.

UPM Raflatac does not intentionally add any oxo-degradable additives to its products and has no reason to suspect these substances are present in our products. This information is based on knowledge of label stock processing and raw materials, review of available safety data sheets, and statements from component suppliers for our products. Please note that no laboratory analysis has been performed to confirm the absence or presence of any of these substances.

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

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



2021-02-04

European compliance statements for UPM Raflatac

compatible materials for recycling. For specific guidance on labeling packaging and packaging recyclability, please get in touch with your UPM Raflatac contact.

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) 2019/1021

UPM Raflatac does not intentionally add any of these substances in Part A of Annex I of Regulation (EC) 2019/1021 (including the amendment to Annex I in Delegated Regulation (EU) 2020/1204) 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 | Dieldrin | Mirex |
| Pentabromodiphenyl ether | Endrin | Toxaphene |
| Hexabromodiphenyl ether | Heptachlor | Hexabromobiphenyl |
| Heptabromodiphenyl ether | Endosulfan | Hexabromocyclododecane |
| decaBDE | Hexachlorobenzene | Hexachlorobutadiene |
| PFOS & its derivatives | Chlordecone | PCP & its salts & esters |
| DDT | Aldrin | Polychlorinated naphthalenes |
| Chlordane | Pentachlorobenzene | SCCPs |
| Hexachlorocyclohexanes, including lindane | PCB | PFOA, its salts |
| | Dicofol | PFOA-related compounds |

This information is based upon our knowledge of label-stock processing and raw materials, 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,



2021-02-04

European compliance statements for UPM Raflatac

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 and associated products either as an additive or as a raw material. 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 and associated products, 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.

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) The "Candidate List of Substances" was last updated on 2021-01-19.



2021-02-04

European compliance statements for UPM Raflatac

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.

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 8 June 2011 and Commission Delegated Directive (EU) 2015/863 (RoHS3) of 31 March 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.

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 that 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



2021-02-04

European compliance statements for UPM Raflatac

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 3rd 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).

Summary of changes

| Page | Date | Comment |
|------|-------------------------------|---|
| 3 | January 12 th 2021 | Addition of a statement regarding Cobalt. |
| 5 | January 12 th 2021 | Updated to the wording under EN13430. |
| 7 | January 20 th 2021 | Updated the REACH statement with reference to the date when the candidate list of Substances was updated. |
| 3 | February 4 th 2021 | Addition of a statement regarding the California Safe Drinking Water and Toxic Enforcement Act of 1986 |

Disclaimer:

This information is based on our most up-to-date knowledge and experience. The information given is for guidance only and subject to change without notice. We cannot assume any liability for damage caused through its use. This statement does not constitute any warranty, expressed or implied and is only intended for the Raflatac customer and cannot therefore be transferred to any third party. We cannot assume any liability for using our products in conjunction with other materials and the customer must make their own qualification and suitability testing before using Raflatac material as part of the customer products. Suitability of Raflatac material in customer products is solely the customer's responsibility. All our products are sold subject to UPM Raflatac's general conditions, available at www.upmraflatac.com and upon request. In case of any discrepancies, the English version of this document shall prevail. This publication replaces all previous versions published.

UPM Raflatac

Tesomankatu 31
PO Box 53
FI-33101 Tampere
Finland

E-mail productsafety@upmraflatac.com

www.upmraflatac.com