

February 19<sup>th</sup>, 2019

RE: Specification WW200

Dear valued customer,

Thank you for your recent inquiry regarding the regulatory status of the Avery Dennison Label and Graphic Materials Europe (LGME) products listed above.

### **REACH and SVHC's**

As a downstream user of chemicals, LGME collaborates closely with all suppliers to both achieve and maintain compliance with Regulation 1907/2006/EC (REACH). This includes ongoing monitoring of pre-registration for all substances in its products, and the registration by the set deadlines. LGME laminates are considered to be articles under REACH. To fulfill the communication obligations according to Article 33 of REACH, LGME notifies customers on the presence of any SVHC in the products above a concentration of 0.1% by weight of the product. SVHC's are not part of the formulation of the product mentioned above and/or do not exceed the maximum concentration level of 0.1% by weight of the products.

# **RoHS and Packaging and Packaging Waste Directive**

LGME products comply with the Packaging and Packaging Waste Directive 94/62/EC, US CONEG Model Toxics legislation and Directive 2000/53/EC on end-of life vehicles, in relation to the various heavy metals paragraphs. The requirement imposed by these pieces of legislation for heavy metals is that the sum of Cadmium, Mercury, Lead and Chromium (VI) in products should be below 100 ppm. Moreover, AD LGME products are compliant with the requirements of the European union directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment, also known as RoHS 2 or RoHS recast. Based on incidental testing and confirmations from suppliers, the concentrations of these substances in LGME products will not exceed the limits.

#### **Ozone Depleting Substances**

LGME and its suppliers do not intentionally add any substances listed in the regulations implementing "the Montreal Protocol" (formally titled "Montreal Protocol on substances that Deplete the Ozone Layer") to the product mentioned above.

DISCLAIMER All Avery Dennison statements, technical information and recommendations are based on tests believed to be reliable but do not constitute a guarantee or warranty. All Avery Dennison products are sold with the understanding that purchaser has independently determined the suitability of such products for its purposes. All Avery Dennison's products are sold subject to Avery Dennison's general terms and conditions of sale, see <a href="http://terms.europe.averydennison.com">http://terms.europe.averydennison.com</a>

# **Persistent Organic Pollutants**

LGME and its suppliers do not intentionally add any substances listed in the regulations implementing "the Stockholm Protocol" (formally titled "Stockholm Protocol on Persistent Organic Pollutants") to the product mentioned above.

# **California Proposition 65**

LGME and its suppliers do not intentionally add substances listed in the regulations implementing "California Proposition 65" (formally titled "The Safe Drinking Water and Toxic Enforcement Act of 1986") to the product mentioned above.

### Latex (Natural Rubber)

LGME and its suppliers do not intentionally add Latex (Natural Rubber) as an ingredient to the manufacturing of the product listed above; therefore, it is not expected to be present in the final composition. If this substance happens to be present, it likely would be present only at a trace level. Because we do not routinely analyze LGME products for this substance, we cannot state categorically that the materials are "free" from this substance.

### **Conflict Minerals**

LGME and its suppliers do not use any of the regulated minerals or their derivatives as listed in the U.S. SEC Conflict Minerals regulation (Tin, Tantalum, Tungsten and Gold and/or their associated ores) in the formulation or manufacturing of any of its products or their components. This information is based upon LGME's knowledge of its products and information from LGME suppliers.

#### <u>PAH</u>

Polycyclic aromatic hydrocarbons (PAH's) are not intentionally added to the formulation of the product aforementioned.

#### **Phthalates**

Phthalates are to the best of our knowledge not part of the formulation of the product aforementioned.

# **EU Toy Safety chemical requirements**

The heavy metals content of the product aforementioned complies with the concentration limits of the metals outlined in EN 71 - part 3 standard. Pressure sensitive label materials are considered to fall in category III of this standard: Scraped-off. The product aforementioned does comply with the requirements outlined in EN 71- part 9 on Organic Chemical Compounds.

The disclosed information referenced above is to the best of our knowledge and based on LGME's knowledge of the product and information provided by our raw materials and component suppliers. LGME has not conducted testing and we recommend that you or your customer(s) make your own determination on the suitability of the products listed above for your particular application.

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LGME believes this information is accurate and is offered in good faith. This information is subject to revision when additional knowledge/information is gained.

We trust that we have answered your questions. For more information, please contact your Technical Sales Representative or Application Consultant.

Sincerely,

Product Compliance Department
Avery Dennison Label and Graphic Materials Europe B.V.

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