

## 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 including the self-adhesive label stock products from INTERCOAT, a division of UPM Raflatac GmbH.

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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 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).

### **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), Bisphenol B (BPB) and Bisphenol S (BPS)**

UPM Raflatac does not use Bisphenol A, Bisphenol B 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, commonly 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, with the exception of:

certain monomeric PVC products and

Thermal products containing Bisphenol S which are listed on the SVHC statement.

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.

### 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 the Toxics in Packaging Clearinghouse (TPCH) formerly known as the 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.

### 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).

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, and as such, has no reason to suspect these substances to be present in its products.

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

### Mica

UPM Raflatac does not intentionally add mica (CAS 12001-26-2) in the manufacture of self-adhesive label-stock and associated products either as a raw material or as an additive and as such, we have no reason to suspect it to be present in our products other than trace amounts that are ubiquitous in nature.

### Nanomaterials

In 2011 the EU commission adopted a definition of nanomaterial (2011/696/EU). "Nanomaterial" means a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm". UPM Raflatac does not suspect nanomaterials to be present in its products.

### 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 the materials' required technical properties are maintained.

UPM Raflatac self-adhesive laminate is in conformity with the minimisation requirement in Annex II of Directive 94/62/EC paragraph 1. In accordance with the methodology laid out in CEN/TR 13695-2:2019 Part 2: "Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment". UPM Raflatac has no reason to suspect that any substances or preparations used in the manufacturing process of laminate classified as dangerous to the environment are likely to be released in emissions, ash or leachate.

### **EN13429 Packaging – Reuse**

UPM Raflatac manufactures self-adhesive laminate for use as labels; they are not designed for reuse as labels but self-adhesive labels can facilitate the reuse of the main packaging and logistics containers that are labelled. Further information is available on request.

### **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 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**

Composting of the packaging can be considered as an option if prevention, reuse, recycling, or other types of recovery are not possible, and only where suitable home or industrial composting is available. 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) 2024/2570) listed below in the manufacturing processes of any of our factories, and as such, has no reason to suspect these substances to be present in its products.

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 & related compounds
Methoxychlor.	Dicofol	PFHxS its salts & 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.

### Polyfluoroalkyl Substances (PFASs)

UPM Raflatac does not intentionally add Perfluorooctanoic acid (PFOA; CAS RN: 335-67-1) or Perfluorooctanesulfonic acid (PFOS; CAS RN: 1763-23-1) or other Telomer-based Poly Fluorinated Surfactants, or long-chain PFASs ("C8" and above) in the manufacture of self-adhesive laminate and associated products. Please note that our grease and oil resistant papers namely FOODGLOSS-FSC (HIT) which contain short-chain per- and polyfluoroalkyl substances (PFASs "C6" and below).

### 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 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, excluding certain monomeric PVC products comply 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

Please be note that monomeric PVC products from INTERCOAT, a division of UPM Raflatac GmbH, contain DIDP and DINP at levels greater than 0.1%. This is subject to restriction 52 from Annex XVII of REACH.

### 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 2025-01-21.

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 certain monomeric PVC products and our grease and oil resistant papers, namely FOODGLOSS-FSC (HIT).

Monomeric PVC Products: These products contain materials listed in the Authorization List or Annex XVII of REACH. Specifically, raw material suppliers have reported that these products contain Diisodecyl phthalate (DIDP), CAS No. 68515-49-1, and Di-isononylphthalate (DINP), CAS No. 28553-12-0, at levels greater than 0.1%, which are subject to restriction 52 from Annex XVII of REACH.

FOODGLOSS-FSC (HIT): This face material contains short-chain per- and polyfluoroalkyl substances (PFASs “C6” and below), which are subject to entry 79 of Annex XVII of REACH.

### **REACH.REACH, UK**

Both the EU and UK now have two separate REACH legal systems which are not linked.

UPM Raflatac continues to meet the requirements for notification regarding “Candidate List of Substances” under UK REACH legislation should any SVHC’s be present in concentrations greater than 0,1% (w/w) with the last inclusion of chemicals on 2020-06-25.

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

### **Recycled materials**

Recycled content materials are identified in the technical information sheets. If no information is provided there (by product name, product description, or other details), they are made from virgin material. Paper materials sold under UPM Raflatac’s FSC™ C012530 certificate as FSC Mix Credit may contain wood from FSC-certified forests, recycled material, or controlled wood as defined by FSC. Currently, the recycled fiber content is typically considered non-significant unless explicitly stated in the technical information sheet.



### 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 place, which includes all the elements which are clearly outlined in Article 6 of the Regulation.

### Toxic Substance Control Act (TSCA)

UPM Raflatac does not intentionally add the substances of concern listed below to its products, and as such, has no reason to suspect these substances to be present in its products.

• Phenol, isopropylated phosphate (3:1)	(PIP; CAS RN: 68937-41-7)
• 2,4,6-Tris(tert-butyl) phenol	(TTBP; CAS RN: 732-26-3)
• Pentachlorothiophenol	(PCTP; CAS RN: 133-49-3)
• Decabromodiphenyl ether	(DecaBDE; CAS RN: 1163-19-5)
• Hexachlorobutadiene	(HCBd; CAS RN: 87-68-3)

### General product safety, Regulation (EU) 2023/988

Laminates manufactured by UPM Raflatac are safe products in accordance with article 3 of the materials description given by REGULATION (EU) 2023/988 On general product safety, repealing Directive 2001/95/EC.

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

<b>Date</b>	<b>Comment</b>
January 12 <sup>th</sup> 2021	Addition of a statement regarding Cobalt.
January 12 <sup>th</sup> 2021	Updated to the wording under EN13430.
January 20 <sup>th</sup> 2021	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
February 4 <sup>th</sup> 2021	Addition of a statement regarding the California Safe Drinking Water and Toxic Enforcement Act of 1986.
June 23 <sup>rd</sup> 2021	Addition of Bisphenol B
June 23 <sup>rd</sup> 2021	Addition of a statement regarding Nanomaterials.
July 12 <sup>th</sup> 2021	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 10 <sup>th</sup> 2022	Updated the wording under EN13429 and EN13432
January 17 <sup>th</sup> 2022	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 27 <sup>th</sup> 2022	Heavy metal content statement has been updated with reference to Toxics in Packaging Clearinghouse (TPCH) which was formerly known as the Coalition of North-eastern Governors' (CONEG, US)

January 27 <sup>th</sup> 2022	Oxo-degradable materials statement has been updated, the deadline for translating the directive into national law has now passed so this section has been removed.
June 14 <sup>th</sup> 2022	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
August 2 <sup>nd</sup> 2022	Updated the wording under EN13428
January 3 <sup>rd</sup> 2023	Email address is now <a href="mailto:productsafety.emeia@upmraflatac.com">productsafety.emeia@upmraflatac.com</a>
January 3 <sup>rd</sup> 2023	Changed the location of PFOS statement so it is alphabetical order.
January 3 <sup>rd</sup> 2023	Modified the table on for RoHS, format change only
January 3 <sup>rd</sup> 2023	Included a statement on Toxic Substance Control Act (TSCA)
January 17 <sup>th</sup> 2023	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
February 1 <sup>st</sup> 2023	Statement now including the self-adhesive labelstock products from INTERCOAT, a division of UPM Raflatac GmbH, but excluding their PVC range.
February 1 <sup>st</sup> 2023	Replaced the statement regarding Perfluorooctane sulfonates (PFOS) with Polyfluoroalkyl substances (PFASs)
February 1 <sup>st</sup> 2023	Reference is now made to UK REACH
June 26 <sup>th</sup> 2023	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 23 <sup>rd</sup> 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 23 <sup>rd</sup> 2024	Reference is made to REGULATION (EU) 2023/988 On general product safety repealing Directive 2001/95/EC,
February 8 <sup>th</sup> 2024	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2023/1608) regarding PFHxS its salts & related compounds.
February 8 <sup>th</sup> 2024	Some minor changes to the wording only in Ozone-depleting chemicals section.
June 28 <sup>th</sup> 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
November 20 <sup>th</sup> 2024	<p>PVC products from INTERCOAT, a division of UPM Raflatac GmbH, are now included in the statement.</p> <p>Changes have been made to the following:</p> <p>California Prop 65: Added information about Thermal products with Bisphenol S and PVC products.</p>

	<p>New statement regarding Mica.</p> <p>PFAS Statement: Updated for FOODGLOSS-FSC (HIT) with short-chain PFASs.</p> <p>Phthalates: Included monomeric PVC products with DIDP and DINP.</p> <p>REACH: Updated with latest Candidate List of Substances. For Annex XVII there are specified exceptions for monomeric PVC products and FOODGLOSS-FSC (HIT).</p> <p>Recycled Materials: Provided more information on recycled content.</p>
November 21 <sup>st</sup> 2024	Modified the REACH statement.
November 22 <sup>nd</sup> 2024	Minor formatting changes only.
December 18 <sup>th</sup> 2024	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2024/ 2570 and added Methoxychlor.
December 20 <sup>th</sup> 2024	Correction to the section on Persistent Organic Pollutants (POPS)
January 22 <sup>nd</sup> 2025	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.

**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](http://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.