

FEDRIGONI

SELF-ADHESIVES

21st March 2025

General Product Compliance Datasheet

The information herein contained is intended to advise our customers about the compliance status of products marketed by Fedrigoni Self-Adhesives in the European Union, with regard to most common regulatory topics.

Please be aware that this statement is only valid for products as such, as supplied and does not cover subsequent transformations (printing, die cutting, further coating or lamination) after which compliance needs to be reassessed: it is always a responsibility of the producer of the final item to verify its suitability for the real or foreseeable use conditions, as well as to make sure that articles meet their relevant requirements.

Reg. (EC) 1907/2006 (REACH): all products marketed by Fedrigoni Self-Adhesives in the EU comply with requirements of REACH Regulation which are relevant for *articles* and, to the best of our knowledge, do not contain any substance listed in Annex XIV, Annex XVII, or in the Candidate List of Substances of Very High Concern (SVHC) in concentration above 0.1 % (w/w) – last update November 7th, 2024.^(*)

^(*)Please be aware that an exception to this statement is represented by products containing 4,4'-sulfonyldiphenol, or bisphenol S (BPS, CAS n. 80-09-1), included in the Candidate List of Substances of Very High Concern as of January 17th, 2023. A list of affected products is included in our REACH declaration, available in our website (<https://selfadhesives.fedrigoni.com/certifications/>).

Safety Data Sheets (SDS): all products marketed by Fedrigoni Self-Adhesives in the EU fall under the definition of *article* according to REACH Regulation. Hazard classification rules set in Reg. (EC) 1272/2008 (CLP) only apply to *chemical substances, mixtures, or explosive articles*: it is thus not possible to issue a safety data sheet for self-adhesive materials.

Reg. (EU) 10/2011 and Reg. (EC) 1935/2004 (Food Contact Materials): a specific subset of products marketed by Fedrigoni Self-Adhesives in the EU is qualified for direct contact with food: for these products, the food contact status is explicitly mentioned in the regulatory section of the technical datasheet, and a declaration containing all relevant information is available upon request.

Please be aware that, even in the absence of such information, self-adhesive products can be used in all food applications where a functional barrier as defined by Reg. (EU) 10/2011 exists between the product and the food.

Reg. (EU) 528/2012 (Biocide Products Regulation): all products marketed by Fedrigoni Self-Adhesives in the EU fall out of scope of the abovementioned Regulation. Preservatives or similar biocide substances can be used in small amounts by our raw material suppliers, for instance to improve the shelf life of water-based adhesives: however, no biocide is used to treat nor intentionally incorporated in our products, which based on current guidance provided by the European Commission are not considered *treated articles*.

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Dir. (EU) 2015/863 (RoHS): all products marketed by Fedrigoni Self-Adhesives in the EU fall out of scope of the abovementioned Directive, which specifically covers *electrical and electronic equipment*; nonetheless, we can confirm that none of the restricted substances is intentionally added above the concentration limits therein indicated.

Safe Drinking Water and Toxic Enforcement Act of 1986 (California Proposition 65): none of the substances known to the State of California to cause cancer or reproductive toxicity, according to the latest version of the substance list, is intentionally added in any product marketed by Fedrigoni Self-Adhesives in the EU.^(*)

Please be aware that our products may contain technically unavoidable traces of some of these substances, such as residual solvents in solvent-based adhesives.

We expect that, even where traces are present, applicable safe harbor levels would not be exceeded in the foreseeable use conditions; however, since requirements of Proposition 65 are limited to State of California and have no direct relevance in other countries, compliance should in any case be verified by whoever introduces the article in the Californian market.

^(*)Exceptions to this statement are represented by:

- 1) Products containing 4,4'-sulfonyldiphenol, or bisphenol S (BPS, CAS n. 80-09-1), included in the List of Substances known to the State of California to cause cancer or reproductive toxicity as of December 29th, 2023. A list of affected products is included in our REACH declaration, available in our website (<https://selfadhesives.fedrigoni.com/certifications/>).
- 2) Products containing specific phthalate additives in a PVC film, the latter being always explicitly mentioned in the product description or technical datasheet: for these products, a statement on phthalate content can be provided upon request.

Toxic Substances Control Act (TSCA): all chemicals in used in the manufacturing of products marketed by Fedrigoni Self-Adhesives in the EU are listed on the TSCA inventory.

None of the substances identified as Persistent, Bioaccumulative, and Toxic (PBT) under TSCA Section 6(h), namely

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

is intentionally added to any of these products.

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Please note that requirements of the Toxic Substances Control Act are limited to the United States of America and have no direct relevance in other countries: compliance should in any case be verified by whoever introduces the article in the U.S. market.

Reg. (EU) 988/2023 (General Product Safety Regulation): none of the products marketed by Fedrigoni Self-Adhesives in the EU, as such, falls in the scope of the abovementioned Regulation, which specifically applies to *consumer products*.

None of these products is intended for consumer use as it is nor, in foreseeable circumstances, might be used by consumers without further processing and transformation by other economic operators.

When relevant, the responsibility to carry out a risk assessment would lie with actors further down the supply chain: in this regard, we confirm our availability to support our customers and end-users with all information on our materials needed to assess the safety of their products.

As regards specific substances of concern, to the best of our current knowledge and with respect to face material and adhesive only, we can hereby confirm the following information referred to all products marketed by Fedrigoni Self-Adhesives in the EU:

Allergens: no such substance, as listed on Annex II of Reg. (EU) 2011/1169, is intentionally added.

Animal-derived substances: no such substance is used by Fedrigoni Self-Adhesives or our raw material suppliers: however, according to information provided by our raw material suppliers, animal-derived substances, such as widely used chemical additives originated from tallow, may be employed further up the supply chain. We confirm that, to the best of our knowledge, all these substances fulfil relevant regulatory requirements, and that all products we supply can be considered safe with regards to **BSE/TSE**.

Benzophenone: no such substance is intentionally added.

Bisphenol A (BPA): no such substance is intentionally added.

Bisphenols and derivatives, hazardous as defined by Reg. (EU) 2024/3190: no such substance is intentionally added.^(*)

^(*)Please be aware that an exception to this statement is represented by products containing 4,4'-sulfonyldiphenol, or bisphenol S (BPS, CAS n. 80-09-1), included in the Candidate List of Substances of Very High Concern as of January 17th, 2023. A list of affected products is included in our REACH declaration, available in our website (<https://selfadhesives.fedrigoni.com/certifications/>).

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Chlorine-based bleaching agents: paper used in products supplied by Fedrigoni Self-Adhesives is manufactured using cellulose fibre bleached with methods that are **elemental chlorine-free (ECF)**, although totally chlorine-free (TCF) methods are also used to a minor extent.

Conflict minerals: no such substance, as defined by the U.S. "Dodd-Frank Wall Street Reform and Consumer Protection Act", and by Reg. (EU) 2017/821, such as gold, tin, tantalum, tungsten, or their associated ores, is intentionally added.

Endocrine disruptors: no substance included in *List I: Substances identified as endocrine disruptors at EU level* is intentionally added.^(*)

Furthermore, none of the substances considered similarly concerning and included in lists established by **French AGEC law n°2020-105**, as amended by *Arrêté du 30 août 2023* and *Arrêté du 28 sept 2023*, namely

Phthalate de diisooctyle (DIOP) (CAS 27554-26-3)
1,3-benzenediol (Resorcinol) (CAS 108-46-3)
Mancozeb (CAS 8018-01-7)
Cholecalciferol (CAS 67-97-0)

is intentionally added above the thresholds therein specified.

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Epoxy derivatives: no such substance, as defined by Reg. (EC) 2005/1895 (BADGE, BFDGE, NOGE), is intentionally added.

Genetically modified organisms (GMO): no such substance is intentionally added, nor is any DNA intended to be present in the product. However, according to the information provided by our raw material suppliers, it is not possible to rule out the use of GMOs further up the supply chain, specifically in the manufacturing of specific substances and additives: further information in this sense can be provided upon request.

Heavy metals: no such substance, as specified in Dir. 94/62/EC (and amendments up to Dir. (EU) 2018/852), and Model Toxics in Packaging Legislation (CONEG), namely cadmium, chromium (VI), lead and mercury, is intentionally added above the specific concentration limits therein indicated.

Halal and Kosher: products can only be claimed Halal or Kosher in presence of a third-party certification: please be aware that Fedrigoni Self-Adhesives does not currently certify any supplied product according to Halal or Kosher requirements. Please see "Animal-derived substances" for further information.

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Irradiation or ionizing radiation: no such process, intended as exposure to radiation for the purpose of sterilization or preservation, is carried out.

Please note that *Corona treatment* or analogous processes might be employed within the manufacturing of our products or raw materials: such surface treatments are customary for the plastic and paper industries, and deemed irrelevant for the safety profile of finished products in their intended applications.

Mineral oils (MOSH/MOAH): we inform you that mineral oils can be contained as a fundamental ingredient of many hot-melt pressure-sensitive adhesives, with few exceptions. Please note that, to date, we are not aware of any regulatory restriction on these substances whose scope also includes adhesives: specifically, French law (No. 2020-105 (AGEC), Decree No. 2020-1725, Decree of April 13th, 2022) mentions requirements for mineral oils in printing inks, thus not including adhesives. Statements on the mineral oil content of specific adhesive grades used in our products can be available upon request.

Natural rubber / Latex: no such substance is intentionally added.

Nitrosamines: no such substance is intentionally added.

Oxo-degradable materials: no such substance is intentionally added.

Ozone-depleting substances: no such substance, as prohibited by Reg. (EU) 2024/590 repealing Reg. (EC) 2009/1005, is intentionally added.

Per- and polyfluoroalkyl substances (PFAS): no such substance, as currently identified in the Candidate List of Substance of Very High Concern (SVHC) or in Reg. (EU) 2019/1021 on persistent organic pollutants, is intentionally added.

Please be aware that the regulatory framework regarding PFAS is still evolving: specifically, if the restriction proposal submitted to the European Chemicals Agency (ECHA) on January 13th, 2023 and made public on February 7th, 2023 would come into effect as is, some fluorinated substances currently used by our raw material suppliers or further up the supply chain could become restricted.

Fedrigoni Self-Adhesives is also aware of the thresholds on PFAS in food-contact packaging published on January 22nd, 2025 and applicable from applicable from August 12th, 2026 as part of the new Regulation on Packaging and Packaging Waste.

We confirm our commitment, together with that of our raw material suppliers, to ensure a timely phase-out of these substances, where relevant, as well as to implement relevant testing and due diligence to guarantee compliance of all products concerned.

Persistent organic pollutants (POPs): no such substance, as listed in Annex I of Reg. (EU) 2019/1021, is intentionally added.

Phthalates: no such substance, as currently restricted by Reg. (EC) 1907/2006 (REACH) or Dir. (EU) 2015/863 (RoHS), is intentionally added.*)

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Please be aware that traces of phthalates may be present in products containing a PE or PP film, as impurities from the catalytic system used in the manufacturing of the base polyolefin resins.

(*)Other non-restricted phthalates may be present in products containing a PVC film, the latter being always explicitly mentioned in the product description or technical datasheet: for these products, a statement on phthalate content can be provided upon request.

Polycyclic Aromatic Hydrocarbons (PAH): no such substance is intentionally added.

PVC: unless explicitly mentioned in the product description or technical datasheet, no such substance is intentionally added.

Synthetic polymer microparticles (“Microplastics”): no such substance, as defined by Reg. (EU) 2023/2055, is intentionally added.

Vegan: products can only be claimed Vegan in presence of a third-party certification: please be aware that Fedrigoni Self-Adhesives does not currently certify any supplied product according to Vegan requirements. Please see “Animal-derived substances” for further information.

This information is provided to the best of our knowledge, and mostly on the basis of declarations from our raw materials’ suppliers.

Please note that, according to the generally acknowledged rules of technology, the contamination with traces of unwanted components cannot be completely ruled out: Fedrigoni Self-Adhesives does not specifically analyse for the presence of all abovementioned substances, and thus it is not possible to guarantee their absence or concentration below any specific threshold value.

This statement is valid for products as such, as supplied and does not cover subsequent transformations (printing, die cutting, further coating or lamination) after which the suitability for the required use needs to be reassessed: it is always a responsibility of the producer of the final item to verify its suitability for the real or foreseeable use conditions, as well as to make sure that articles meet their relevant requirements.

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