

HP 235 Regulatory Compliance Letter

Directive 2011/65/EU (Restriction of Hazardous Substances-RoHS)

Shurtape® confirms due diligence has been performed through careful review of raw material specifications, vendor certifications and random testing to ensure substances are not present above the specified limits per the RoHS III Directive: Cadmium (Cd): 0.01%; Mercury: 0.1% (Hg); Lead (Pb): 0.1%; Hexavalent chromium (Cr6+): 0.1%; Polybrominated biphenyls (PBB): 0.1 %; Polybrominated diphenyl ethers (PBDE): 0.1 %; Bis(2-Ethylhexyl) phthalate (DEHP): 0.1%; Benzyl butyl phthalate (BBP): 0.1%; Dibutyl phthalate (DBP): 0.1%; Diisobutyl phthalate (DIBP): 0.1%.

Directive 94/62/EC (Packaging and Packaging Waste)

HP 235 meets European Union Directive 94/62/EC in regards to packaging standards, which restrict quantities of Lead (Pb), Cadmium (Cd), Mercury (Hg) and Hexavalent Chromium (Cr(VI)). Raw materials utilized in the production process may contain unintended impurities that include the aforementioned heavy metals.

REACH SVHC

HP 235 is an article as defined by Article 3(3) of Regulation (EC) 1907/2006 (REACH). As an article, the product is not subject to the Safety Data Sheet requirements outlined in Article 33(1) of the same Regulation. HP 235 does not have an intended release of a chemical substance, is not a chemical mixture, and is not subject to pre-registration or the registration process.

HP 235 contains no “substances of very high concern” (SVHC) in a concentration above 0.1% (w/w) as promulgated 28 October 2008 (REACH Article 59) on the Candidate List of Substances of Very High Concern (REACH Annex XIV) inclusive of updates through July 2019. Shurtape® continues to monitor the SVHC list and its updates.

CONEG Model Toxics in Packaging Legislation

Shurtape® certifies that all packaging and packaging components comply with the requirements of the Model Toxics in Packaging Legislation. Specifically:

- 1) We certify that the regulated metals – lead, mercury, cadmium, and hexavalent chromium – were not intentionally added to any package or packaging component during the manufacturing process.
- 2) We further certify that the sum of the incidental concentration levels of lead, mercury, cadmium and hexavalent chromium present in any package or package component does not exceed 100 parts per million by weight.
- 3) We will maintain adequate documentation of this certification for inspection upon request.

California Proposition 65

Shurtape® hereby certifies that, to the best of its knowledge, this product does not contain chemicals known to the State of California to cause cancer or reproductive toxicity (“Proposition 65 Chemicals”) at levels which would require a warning.

Conflict Minerals

Shurtape® products are outside the scope of the SEC's Conflict Minerals Rule (Dodd-Frank Section 1502). Shurtape® confirms due diligence has been performed through careful review of raw material specifications and vendor certifications to ensure its product does not contain Tungsten, Tantalum, Gold and Tin as intentional raw materials or in the manufacturing process of Shurtape® products. Additionally, raw materials used to manufacture Shurtape® products are not sourced from Democratic Republic of Congo or adjoining countries.

FDA Compliance

HP 235 Pressure Sensitive Tape meets FDA requirements for indirect food additives as outlined in 21 CFR 175.105 for Adhesive Components and 21 CFR Part 177.1520 for Olefin Polymers, regarding adhesive and tape products used as “Indirect food” packaging and additives.

HP 235 may be safely used in packaging, transporting, or holding food in accordance with conditions where an effective functional barrier to food contact surfaces is in place and where the quantity of adhesive contacting food does not exceed trace amounts at seams and edges as outlined in CFR Title 21, Part 174.5 and Part 175.105.

Social Compliance

Shurtape Technologies, LLC and their subsidiaries are committed to provide products to our customers manufactured in an ethical manner utilizing ethically sourced materials and products. Shurtape will not tolerate human trafficking, indentured servitude, or forced or coerced labor of any kind in its manufacturing facilities, distribution centers, sales locations, or their supply chain. For additional information, please visit <https://shurtapetech.com/about/social-compliance/>.

Animal Testing

Shurtape® is pleased to confirm that no animal testing is performed on any Pressure Sensitive Tape manufactured by Shurtape® Technologies, LLC or its subsidiaries.

Latex

HP 235 pressure sensitive hot-melt tape is manufactured with Biaxially-oriented polypropylene (BOPP) film and a thermoplastic adhesive system. The facility where HP 235 is produced does not utilize natural or synthetic latex in the manufacturing process.

Allergens

Upon careful review of all raw material components that compose HP 235 pressure sensitive tape, Shurtape® has concluded that this product does not contain materials based on or derived from milk, eggs, wheat, fish, crustaceans, soybean, tree nuts, or peanuts nor are any of these materials used in the manufacturing process.

Asbestos

Asbestos is not used as a component in any Shurtape® product.

Dimethyl Fumarate

Dimethyl Fumarate (DMF) CAS #624-49-7 is neither intentionally added as a raw material, nor used in the manufacturing process of Shurtape® Pressure Sensitive Tapes. DMF is not expected to be present in concentrations above 0.1 mg/kg in such products or any part.

Shurtape® recommends the user determine whether the product is fit for the users' specific purpose and is suitable for the users' method of application.

Should you have further questions regarding the usage of these products, please contact the EHS Department at 828-322-2700 or via email at mbranch@shurtape.com .

Sincerely,

Misty Branch

Environment, Health & Safety
Sr. Regulatory Specialist

Origination/Revision Date: 7/23/2019