

## **HP 235 Regulatory Compliance Letter**

### **Directive 2011/65/EU & 2015/863/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%.

### **Packaging and Packaging Waste**

HP 235 complies with the US Model Toxics in Packaging Legislation and the EU Packaging Directive 94/62/EC Legislation as there is no intentionally added lead, cadmium, hexavalent chromium or mercury, and the sum total concentration of these substances in the product does not exceed 100 ppm by weight. 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 is not known to contain any “substances of very high concern” (SVHC) in a concentration above 0.1% (w/w) identified by Article 59 of REACH (REACH Annex XIV), inclusive of updates through January 2023. Shurtape® continues to monitor the SVHC list and its updates.

### **TSCA PBT Chemicals Section 6(h)**

Shurtape® products do not contain the substances listed below as an intentional raw material or listed as an ingredient of the raw materials based on the review of the information provided by our raw material suppliers.

- \* decaBDE (CAS 1163-19-5)
- \* Phenol Isopropylated Phosphate (3:1) (CAS 68937-41-7)
- \* 2,4,6-Tri-tert-butylphenol (CAS 732-26-3)
- \* HCBd (CAS 87-68-3)
- \* PCTP (CAS 133-49-3)

### **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.

## **Indirect Food Contact Compliance**

HP 235 Pressure Sensitive Tape meets FDA requirements for indirect food additives as outlined in 21 CFR 175.105 for Adhesive Components for adhesives used in "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.

## **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 tape is manufactured in a facility that utilizes natural rubber.

As such, trace latex contamination is possible. HP 235

Please refer to TDS for the specific composition of this product.

## **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, sesame, 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.

## **PFAS**

Shurtape® confirms that, to its knowledge, its pressure sensitive tapes and consumer products do not contain PFAS as an intentionally added component. In particular, Shurtape® confirms that its pressure sensitive tapes and consumer products do not contain perfluorooctane sulfonic acid (PFOS) or perfluorooctanoic acid (PFOA) as intentionally added components. These statements are based on Shurtape's review of information provided by its raw material suppliers. Shurtape® has filed an extension request for the Maine notification requirements concerning PFAS-containing products until it can further investigate its supply chain.

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](mailto:mbranch@shurtape.com).

Sincerely,

*Misty Branch*

Environment, Health & Safety  
Sr. Regulatory Specialist

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