

## **CP 027 Regulatory Compliance Letter**

### **EU Directive 2011/65/EU & 2012/19/EU**

Shurtape® CP 027 Pressure Sensitive Tape is outside the scope of the requirements set forth by European Union Directive 2011/65/EU – ROHS II and subsequent amendments, and the European Union Directive 2012/19/EU – WEEE relating to electronics and electrical equipment which bans or limits certain hazardous substances; however, Shurtape® confirms due diligence has been performed through careful review of raw material specifications, vendor certifications and random testing to insure its product does not contain these substances in concentrations exceeding EU regulatory limits.

### **EU Directive 94/62/EC**

CP 027 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.

### **TPCH**

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.

**FDA**

CP 027 is not appropriate for use in applications where the product could potentially become a direct or indirect food additive. Therefore, this product should not be used in such a manner that would result in contact either directly or indirectly with food.

**Asbestos**

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

**REACH SVHC**

CP 027 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. CP 027 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.

CP 027 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 January 2019. Shurtape® continues to monitor the SVHC list and its updates.

**Illegal Practices, Human Trafficking**

To the best of its knowledge, Shurtape® is compliant with all local and federal laws governing labor practices and does not knowingly source materials from suppliers that are engaged in illegal practices or human trafficking.

**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.

**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 insure 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.

**Latex**

CP 027 is manufactured with synthetic latex saturated crepe paper backing and coated with acrylic adhesive. However, CP 027 is produced in a facility that utilizes natural rubber to manufacture other products. As such, trace latex contamination is possible.

**Allergen**

Upon careful review of all raw material components that compose CP 027 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.

**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.

**Bisphenol A**

Bisphenol A (BPA) CAS #80-05-7 is neither intentionally added as a raw material, nor used in the manufacturing process of Shurtape® Pressure Sensitive Tapes.

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  
Regulatory Specialist

Origination/Revision Date: 1/21/2019