Mactac
Regulatory Status

Roll Label
Products

This Regulatory Bulletin covers Mactac Roll Label Products using the following emulsion acrylic adhesives:

640-AT
MR-840
MR-860
MP238

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Product Identification

Product Classification

All Mactac Roll Label Products are considered **Articles** as defined by the Federal Occupational Safety and Health Administration (OSHA).

According to the OSHA's Hazard Communication Standard (29 CFR 1910.1200 (c):

Article means a manufactured item other than a fluid or particle:

- *(i) which is formed to a specific shape or design during manufacture.*
- *(ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and*
- *(iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical and does not pose a physical hazard or health risk to employees.*

SDS

According to 29 C.F.R. 1910.1200 (b)(6)(V), the section *1910.1200 - Hazard Communication* does not apply to articles. Consequently, as articles, Mactac Roll Label products are exempt from the Safety Data Sheets (SDS) provisions of 29 C.F.R. 1910.1200(g)(6).

US Regulation

FDA Status

Mactac adhesives covered by this document comply with 21 CFR 175.105 – Adhesives. Compliance with this section requires the adhesive is either separated from food by a functional barrier or used subject to the following limitations:

- In dry food. The quantity of adhesive that contacts packaged dry food shall not exceed the limits of good manufacturing practice.
- In fatty and aqueous food. The quantity of adhesive that contacts packaged fatty and aqueous food shall not exceed the trace amount at seams and at the edge exposure between packaging laminates that may occur within the limits of good manufacturing practice.

The end-user is responsible for determining the applicability of FDA requirements for the intended use(s).

Allergens

Mactac Roll Label products coated with 640AT, MR-840 , MR-860 and MP238 adhesives are not intentionally formulated to contain the following foods that are known to be allergens, as defined in the US Food Allergen Labeling and Consumer Protection Act of 2004:

- Milk
- Eggs
- Fish
- Crustacean shellfish
- Tree nuts
- Peanuts
- Wheat
- Soybeans
- Sesame

This information is based on supplier information, formulation, and manufacturing practices. Mactac does not routinely test for these substances, nor does it require its suppliers to carry out testing.

Volatile Organic Compounds (VOC)

Mactac Roll Label products utilizing 640AT, MR-840 , MR-860 and MP238 adhesives are coated from water-based emulsion. No solvents are used. Any residual monomers are expected to be substantially removed during the coating and drying processes. Mactac does not routinely test for VOC.

Toxic Substances Control Act (TSCA) Restricted Substance Declaration

The United States Toxic Substances Control Act (TSCA) is a federal chemicals management regulation. Under TSCA Section 6, certain substances, and substance families (including treated articles containing these substances) are restricted from distribution in U.S. commerce, including:

- Asbestos
- Lead, when used in paint*
- Polychlorinated biphenyls (PCBs)
- Dioxins
- Chlorofluorocarbons (CFCs, ozone depleting substances)
- Metallic mercury, when used in consumer products
- Formaldehyde, when used in composite wood products*
- Nitrites, when used in certain cutting fluids*
- Hexavalent chromium compounds, when used in water treatment*
- Five Persistent, Bioaccumulative, and Toxic substances restricted in 2021:
    - PIP 3:1 (CAS 68937-41-7)
    - DecaBDE (CAS 1163-19-5)
    - 2,4,6 TTBP (CAS 732-26-3)
    - HCBD (CAS 87-68-3)
    - PCTP (CAS 133-49-3)

*Not applicable to Mactac products

Based on supplier information, formulation, and manufacturing practices, Mactac Roll Label Products coated with the adhesives identified in this document are not manufactured with the addition of the above listed chemicals.

Toxics in Packaging Clearinghouse (TPCH)

The Toxics in Packaging Clearinghouse (TPCH) was established by the Coalition of Northeastern Governors (CONEG) to promote the Model Toxics in Packaging Legislation that CONEG developed. CONEG's Source Reduction Council created the model legislation in 1989 to reduce heavy metals in packaging. TPCH was formed in 1992 to support states to adopt it.

Mactac does not intentionally add the following heavy metals (or their compounds): cadmium, hexavalent chromium, lead, mercury, as well as phthalates and perfluoroalkyl and polyfluoroalkyl substances (PFAS) to any of the Roll Label products, as defined on the 2021 Toxic in Packaging Clearinghouse (TPCH) update. Mactac does not specifically analyze the products for the presence of these substances. Based on our knowledge of the raw materials and the manufacturing process, the sum of any trace quantities of lead, mercury, cadmium, and hexavalent chromium is below legislation limit of 100 ppm.

Consumer Product Safety Improvement Act (CPSIA)

Under the chemical substance requirements set forth in the Consumer Product Safety Improvement Act of 2008 ("CPSIA"), the presence of heavy metals in substrates are restricted in all children's products. In addition, the phthalates denominated as DEHP, DBP, BBP, DINP, DIDP, and DNOP are restricted in toys for children and childcare articles.

Based on supplier information, formulation and manufacturing process, Mactac Roll Label products meet the safety requirements for lead and phthalates in Consumer Product Safety Improvement Act (CPSIA) of 2008 for children's products.

State of California Safe Drinking Water and Toxic Enforcement Act of 1986 - Prop 65

Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm.

The statements below cover regulatory status for the product as sold including face stock, adhesive and liner and it is provided to support downstream compliance under conditions of use where occupational or workplace exposure may occur.

Mactac Regulatory has reviewed the recent California OEHHA update effective July 17, 2026, which added welding fumes and three specific pharmaceutical substances (hydrochlorothiazide, voriconazole, and tacrolimus) to the list. None of them are applicable to our products.

Because our products do not utilize, contain, or generate any of these newly listed substances, our chemical profile remains unchanged

Mactac confirms that the products that utilize acrylic adhesives comply with California Proposition 65 requirements. Based on available information, including raw material composition, supplier data, and manufacturing process evaluations, the use of these products as intended does not result in significant exposure to any chemical included on the latest Proposition 65 list release of December 8th, 2025.

Mactac products are intended, labeled and packaged for industrial conversion processes. It remains the responsibility of downstream users to assess their specific applications, processing conditions, and finished products to determine if a Proposition 65 warning is required for the final product or its packaging.

This statement applies to all Mactac Roll Label items utilizing acrylic emulsion adhesives covered by this document, except for those listed below, under "Bisphenol S – BPS".

Bisphenol S – BPS

The chemical dioxydiphenylsulfone also known as Bisphenol S or BPS (CAS#80-09-1), was added to the Proposition 65 list in December 2023.

All products in Mactac's direct thermal portfolio are manufactured without intentionally added bisphenols. For more information, access Mactac | Simply DT™. Although not intentionally added, **BPS may be present at detectable trace levels**, in all Mactac direct thermal products.

The following products without the NB suffix **contain BPS in detectable amounts** and are being discontinued from Mactac's portfolio: DTJ, DTL, DTM, DTNIR, DTNN, LLT-DTNN, DTNXR, DTNHXR, DTTC, DTNXR and DTNHXR, DTU, DTW, and TCDT.

Safer Products Restrictions and Reporting Rule Safer Products for Washington (SPWA)

The SPWA (WAC 173-337-114) prohibits intentionally added bisphenols in direct thermal paper. The Washington State Department of Ecology considers detections above 200 ppm as intentionally added. Based on documentation from our suppliers and our manufacturing processes, and in accordance with the Washington state department of Ecology definition, Mactac and its affiliated companies Spinnaker and Label Supply confirm that the paper products do not contain intentionally added bisphenols and are in compliance with the Washington State Safer Products Restrictions and Reporting Rule – WAC 173-337114.
Under the current text of WAC 173-337, the bisphenol restriction applies only to thermal paper as defined in the regulation. It does not apply to direct thermal films (e.g., PET or PE substrates). Therefore, all Mactac items utilizing direct thermal film are outside the current scope of this regulation.
This statement applies to all Mactac Roll Label items coated with the adhesives identified by this document, **except for the products:**

- Starting with DTNN, LLT-DTNN, DTTC, DTNXR and DTNHXR (without the identifier NB) that contain Bisphenol S.
- Starting with DTJ, DTL, DTM, DTNIR, DTTC, DTW, DTWR (without the identifier NB) contain bisphenol other than BPS and BPA.

These products containing bisphenols are being discontinued from Mactac's portfolio.

Dodd-Frank Wall Street Reform and Consumer Protection Act

The Public Law 111-203 Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 aims to prevent the use of Conflict Minerals that directly or indirectly finance, or benefit armed groups in the Democratic Republic of the Congo or adjoining countries.
Mactac Roll Label products do not contain Conflict Minerals (columbite-tantalite, cassiterite, wolframite, and gold as identified in Public Law 111-203) and their derivatives (tantalum, tin, and tungsten), as enumerated in 77 Federal Register 56273 and 56285).

Chemical Substances Undergoing Prioritization: High Priority

On December 20, 2019, EPA finalized the designation of 20 chemical substances as High-Priority Substances for TSCA risk evaluations. On December 18, 2024, EPA designated an additional five chemicals as High-Priority Substances, bringing the total of currently designated High-Priority substances to 25.
Acrylic Emulsion adhesives, such as the adhesives covered by this document, do not contain any of the twenty-five chemicals undergoing evaluation as High Priority under TSCA.

EU Regulations

REACH - Substances of Very High Concern (SVHC)

Mactac Roll Label products are classified as "articles" per European Union Regulation (EC) No. 1907/2006 and are not articles with an intended release of a chemical substance. They are exempt from the registration requirements.

These articles do not contain intentionally added Substance of Very High Concerned (SVHC) as published by the European Chemicals Agency (ECHA) on February 4th, 2026, under the provisions of Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) in concentration exceeding 0.1% w/w.

The updated list of the chemicals listed as SVHC under REACH can be found at Candidate List of substances of very high concern for Authorisation - ECHA

This statement applies to all Mactac Roll Label items utilizing the adhesives covered by this document, except for those listed below, under "Bisphenol S – BPS".

Bisphenol S – BPS

The chemical dioxydiphenylsulfone also known as **Bisphenol S or BPS (CAS#80-09-1)**, was added to the REACH-SVHC list in January 2023. This chemical is known to be present in the non-top coated direct thermal papers utilized in the MACTAC products DTNN, LLT-DTNN, DTTC, DTNXR and DTNHXR (without the identifier NB) in concentration above 0.1%w/w. However, these products containing BPS are being discontinued from Mactac's portfolio.

Mactac products *Simply DT Direct Thermal* identified with NB are not manufactured with added bisphenols, including BPS. For more information access Mactac | Simply DT™.

SCIP - **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts)

SCIP is the database for information on **S**ubstances of **C**oncern **I**n articles as such or in complex objects (**P**roducts) established under the Waste Framework Directive (WFD).

To ensure compliance with SCIP, Companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market have to submit information on these articles to ECHA. Refer to REACH-SVHC statement above for SCIP compliance.

Persistent organic pollutants (POPs)

Mactac products coated with coated with 640AT, MR-840 , MR-860 and MP238 acrylic adhesive do not contain intentionally added Persistent organic pollutants (POPs) according to the requirements of **POPs Regulation: Regulation (EU) No 2019/1021, (EU) No 2023/1006 of the European Parliament** and the **12th Conference of the Parties (COP)**.

EU Regulation on Packaging and Packaging Waste (PPWR - EU 2025/40)

Regulation (EU) 2025/40 entered into force on 11 February 2025 and replaces Directive 94/62/EC. It introduces harmonized, directly applicable requirements across the EU, including rules on substances of concern, recyclability, and material restrictions. Mactac Roll Label products comply with the PPWR - EU 2025/40 on the following:

Recyclability: Mactac has conducted recyclability testing on certain products. All recyclability information is available to review through the Mactac Simply Sustainable website:
https://www.mactac.com/Simplysustainable.
All Mactac products with a paper or PET liner, the liner is considered fully recyclable with liner recycling solutions provided through CELAB Europe or TLMI in the US.
Per- and Polyfluoroalkyl Substances: based on supplier information, Mactac Roll Label products do not contain intentionally added PFAS.
Restriction of Hazardous Substances in Electrical and Electronic Equipment - RoHS: Mactac Roll Label products are also RoHS compliant; because RoHS restricts lead, cadmium, mercury, and hexavalent chromium, this compliance supports conformity with the heavy metal requirements of PPWR Article 5(4).

Restriction of Hazardous Substances in Electrical and Electronic Equipment - RoHS

Mactac Roll Label Products coated with acrylic adhesives covered by this document comply with the substance concentration limits established under European Commission Directive 2002/95/EC (RoHS), Directive 2011/65/EU and its subsequent amendments (RoHS 2), including Directive (EU) 2015/863 (commonly referred to as RoHS 3), which restrict the use of certain hazardous substances in each homogeneous material of electrical and electronic equipment (EEE), as follows:

- Less than 0.1% by weight for lead, mercury and hexavalent chromium
- Less than 0.1% by weight for polybromo biphenyls (PBB) and polybrominatedbiphenyl ethers (PBDE)
- Less than 0.01% by weight for cadmium
- Less than 0.1% by weight for bis (2-ethylhexyl phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), diisobutyl phthalate (DIBP)

Based on supplier information, formulation and manufacturing process, Mactac Roll Label products also comply with the chemical requirements of China RoHS. No analytical testing or laboratory verification has been performed.

Mineral Oil

Mineral oil hydrocarbons (MOH) consist of two fractions, mineral oil saturated hydrocarbons (MOSH) and mineral oil aromatic hydrocarbons (MOAH).

Mactac acrylic emulsion adhesives covered by this document contain mineral oil, however, due to the complexity of analytics and the limitations within the industry to evaluate specific content, Mactac cannot provide concentration of MOSH and MOAH in the acrylic adhesives.

Responsible Minerals Initiative (RMI)

Mactac does not directly source or intentionally add any of the Conflict Minerals listed below.

Conflict Minerals Template (CMRT v. 6.5):

Tantalum
Tin
Gold
Tungsten

Extended Mineral Reporting Template (EMRT v. 2.0):

Cobalt	Lithium
Copper	Mica
Graphite	Nickel

In addition, Mactac conducts supply chain survey to ensure that our suppliers are in compliance with the Responsible Minerals Initiative (RMI) requirements.
Based on supplier information, formulation, and manufacturing practices Mica and Cobalt are not used as components, nor are added to the manufacturing process or to Mactac Roll Label products.

TSE/BSE

Mactac products coated with the adhesives covered by this document do not contain Animal Derived Materials.

Per- and polyfluoroalkyl (PFAS) and PFOS (Perfluorooctanesulfonic) substances

Several U.S. states have adopted laws restricting or prohibiting the manufacture, distribution, sale, or offering for sale of certain products containing intentionally added per- and polyfluoroalkyl substances (PFAS).
Based on supplier declarations, raw material composition information, formulation data, and manufacturing knowledge, Mactac Roll Label products utilizing acrylic adhesives covered by this document are not intentionally formulated with PFAS, including perfluoroalkyl and polyfluoroalkyl substances and perfluorooctane sulfonate (PFOS).
This statement is based on information provided by suppliers and internal product knowledge. No analytical testing for PFAS has been performed.

Nitrosamines

Nitrosamines are a class of chemical compounds that are formed when amines react with nitrates and nitrites.
Based on supplier information, formulation, and manufacturing practices Nitrates and Nitrites are not used as components, nor intentionally added to the manufacturing process or incorporated into Mactac products. Therefore, the formation of nitrosamines is not expected in Mactac products.

Substances of Concern

Based on supplier information, formulation and manufacturing process, the Substances of Concern listed below are not used as components, nor are added to the manufacturing process or to Mactac Roll Label products coated with the adhesives covered by this Regulatory Bulletin:

- Aromatic amines
- Asbestos or Crystalline Silica
- Azo Dyes
- Benzophenone
- BHT and BHA
- Bisphenol A (BPA)
- Bisphenol S (BPS)*
- Brominated Flame Retardants
- Chlorinated compounds
- Dimethyl Fumarate
- Dioxins
- Epoxy Derivatives
- EPS – Expanded Polystyrene
- Food Materials or Food Allergens
- Melamine
- Nanomaterial
- Natural Rubber or Natural Rubber Latex
- Nitrosamines
- Ozone Depleting Substances
- Phosphorus- based flame retardant
- Phthalate Plasticizers, including DEHP, DINP, DIDP, DnOP, DnHP, BBP, DBP, DIBP, DCHP
- Polychlorinated Biphenyls (PCBs)
- Poly Vinyl Chloride – PVC (excluding products with vinyl face stocks)
- Short-chained Chlorinated Paraffins (SCCP)
- Tri Nonyl Phenyl Phosphite (TNPP)

*Refer to page 6 and 8 – Bisphenol S

DISCLAIMER:

This Regulatory Bulletin has been prepared by Mactac NA for general information only. It is meant to answer the most common regulatory questions. Regulations, status, and standards will evolve and Mactac will update this document on a regular basis. The determination of the suitability of the final use of the products is the sole responsibility of the customer. Mactac does not perform tests, nor does it require its suppliers to carry out testing. Information on this Regulatory Bulletin is based on supplier information, formulation, and manufacturing practices. For more Regulatory information, please contact your Mactac sales representative or our regulatory team at res-377-regulatoryrequests@mactac.com