Spinnaker

Regulatory Status

Products with Acrylic Emulsion Adhesive

This Regulatory Bulletin covers Spinnaker Products using adhesives:

AP-52
B-92
BP-52
SP-184

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Product Identification

Product Classification

All Spinnaker 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, Spinnaker products are exempt from the Safety Data Sheets (SDS) provisions of 29 C.F.R. 1910.1200(g)(6).

US Regulations

FDA Status

The adhesives AP-52, B-92, BP-52 and SP-184 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).

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.

Spinnaker 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.

Spinnaker 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.

Spinnaker confirms that the products that utilize emulsion acrylic adhesives AP-52, B-92, BP-52 and SP-184 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.

This statement applies to all Spinnaker Roll Label products 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 Spinnaker's direct thermal portfolio are manufactured without intentionally added bisphenols.
Although not intentionally added, BPS may be present at detectable trace levels, in all Spinnaker direct thermal products.

Volatile Organic Compounds (VOC)

Spinnaker Roll Label products coated with AP-52, B-92, BP-52 and SP-184 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. Spinnaker does not routinely test for VOC.

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.
Spinnaker 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 products, as defined on the 2021 Toxic in Packaging Clearinghouse (TPCH) update. Spinnaker 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, Spinnaker products meet the safety requirements for lead and phthalates in Consumer Product Safety Improvement Act (CPSIA) of 2008 for children's products.

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.
Spinnaker 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).

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 Spinnaker Roll Label items except for the products 50121, 50122, 50124 and 50127. These products contain bisphenols however they are being discontinued from Spinnaker's portfolio.

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 Spinnaker products

Based on supplier information, formulation, and manufacturing practices, Spinnaker products coated with adhesives AP-52, B-92, BP-52 and SP-184 are not manufactured with the addition of the above listed chemicals.

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)

Spinnaker 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.
For more information regarding the products using the adhesives covered by this document and REACH-SVHC contact our Regulatory Team at res-377-regulatoryrequests@mactac.com

Restriction of Hazardous Substances in Electrical and Electronic Equipment - RoHS

Spinnaker products using the adhesives AP-52, B-92, BP-52 and SP-184 are in compliance 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, Spinnaker Roll Label products also comply with the chemical requirements of China RoHS. No analytical testing or laboratory verification has been performed.

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.

Recyclability: At this time, Spinnaker has not conducted recyclability testing on our products. However, all Spinnaker products using a paper or PET liner are considered fully recyclable through established liner recycling solutions, such as those offered by CELAB Europe and TLMI in the United States.

Per- and Polyfluoroalkyl Substances: based on supplier information Spinnaker Roll Label products do not contain intentionally added PFAS and meet the applicable PFAS restrictions under the PPWR.

Restriction of Hazardous Substances in Electrical and Electronic Equipment - RoHS: Spinnaker 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).

Persistent organic pollutants (POPs)

Spinnaker products do not contain any 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)**.

Responsible Minerals Initiative (RMI)

Spinnaker 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, Spinnaker conducts supply chain survey to ensure that our suppliers are in compliance with the Responsible Minerals Initiative (RMI) requirements.

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, Spinnaker Roll Label Products utilizing the 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.

Mineral Oil

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

Spinnaker products using the adhesives AP-52, B-92, BP-52 and SP-184 contain mineral oils, however, due to the complexity of analytics and the limitations within the industry to evaluate specific content, Spinnaker cannot provide concentration of MOSH and MOAH in the acrylic adhesives.

TSE/BSE

The Acrylic Adhesives identified by this document do not contain animal derived components materials that would carry a BSE/TSE (Bovine Spongiform Encephalopathy/Transmissible Spongiform Encephalopathy) agent.

The face stocks utilized by “COVER-UP” products **may** contain Casein. Casein has been recognized by the World Health Organization (WHO) as safe with respect to TSE or BSE transmission. And the milk used for casein production is obtained from bovine herds that are certified, by veterinary services, to be healthy and free from infectious diseases and bovine spongiform encephalopathy (BSE) for at least a 12-month period. Our suppliers use milk not from any country listed as an “undue risk for BSE” by the USDA.

All milk has been treated at a minimum temperature of 72°C for a minimum of 15 seconds.

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 Spinnaker products. Therefore, the formation of nitrosamines is not expected in Spinnaker 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 Spinnaker products utilizing acrylic emulsion adhesives AP-52, B-92, BP-52 and SP-184:

- Azo Dyes
- Bisphenol A (BPA)
- Bisphenol S (BPS)
- Brominated Flame Retardants
- Chlorinated compounds (excluding products with vinyl face stocks)
- Dimethyl Fumarate
- Epoxy Derivatives
- EPS – Expanded Polystyrene
- Halogenated compounds
- Melamine
- Natural Rubber or Natural Rubber Latex
- Namo materials
- Ozone Depleting Substances
- Phthalate Plasticizers, including DEHP, DINP, DIDP, DnOP, DnHP, BBP, DBP, DIBP, DCHP
- Plant-derived material
- Polyvinyl Chloride (except for products utilizing PVC face stock)
- Tri Nonyl Phenyl Phosphite (TNPP)

DISCLAIMER:
This document has been prepared by Spinnaker for general information only. It is meant to answer the most common regulatory questions. Regulations, status, and standards will evolve, and Spinnaker 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. Spinnaker 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 Spinnaker sales representative or our regulatory team at res-377-regulatoryrequests@mactac.com