

Spinnaker

Regulatory Status

Products with Acrylic Emulsion Adhesive

This Regulatory Bulletin covers Spinnaker Products using adhesives:

AP-52
B-92
BP-52

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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 and BP-52 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.

Spinnaker and the products using the adhesives AP-52, B-92 and BP-52 comply with Prop 65 by notifying Customers that after evaluation of the nature of our products and our manufacturing processes, the product identified on this letter, does not require California Proposition 65 warning on package as defined on the California Safe Drinking Water and Toxic Enforcement Act of 1986, also referred to as “California Proposition 65”.

Toxics in Packaging Clearinghouse (TPCH)

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.

Volatile Organic Compounds (VOC's)

Spinnaker Roll Label products coated with AP-52, B-92 and BP-52 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's.

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.

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 and BP-52 are not manufactured with the addition of the above listed chemicals.

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 to 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 (1, 2 & 3)

Spinnaker products using the adhesives AP-52, B-92 and BP-52 are in compliance with concentration values listed in European Commission Directive 2002/95/EC and Annex II of Directive 2011/65/EU (RoHS 2) and (EU) 2015/863 restricting the use of certain hazardous substances in each of the homogeneous material in 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 polybrominated biphenyl 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)

Spinnaker products are not tested for the above mentioned substances.

Persistent organic pollutants (POPs)

Spinnaker products using the adhesives AP-52, B-92 and BP-52 do not contain intentionally added Persistent organic pollutants (POPs) as described at the **Regulations (EU) No 2019/1021 and (EU) No 2023/1006 of the European Parliament** on persistent organic pollutants (POPs Regulation).

Conflict Minerals

Spinnaker 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).

Extended Mineral Reporting – Mica and Cobalt

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 Spinnaker products.

EU Packaging Directive – EU 94/62/EC

Spinnaker has not conducted recyclability testing on our products. All Spinnaker 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.

Spinnaker does not intentionally add the following heavy metals (or their compounds): cadmium, hexavalent chromium, lead, mercury. 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.

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

Based on supplier information, formulation, and manufacturing practices, PFAS (Per- and polyfluoroalkyl) and PFOS (Perfluorooctanesulfonic) substances are not used as components, nor are added to the manufacturing process or to the Spinnaker products covered by this document.

Spinnaker does not routinely test for these substances, nor does it require its suppliers to carry out testing.

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 and BP-52 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.

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 and BP-52:

- Azo Dyes
- Bisphenol A (BPA)
- Bisphenol S (BPS)
- Brominated Flame Retardants
- Chlorinated compounds (excluding products with vinyl face stocks)
- Dimethyl Fumarate
- Epoxy Derivatives
- ESP – 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