

Mactac

Regulatory Status

Mactac Industrial Tape Product
IF3091-60 - Acrylic 1 mil GP99 Transfer Adhesive 60#PCK

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Product Identification

Product Classification

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

US Regulation

FDA Status

The adhesives of Mactac Industrial product identified in this document complies 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 Industrial products 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.

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 Industrial 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 Mactac products

Based on supplier information, formulation, and manufacturing practices, Mactac Industrial products are not manufactured with the addition of the above listed chemicals.

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 confirms that the product that utilize emulsion acrylic adhesives covered by this document complies 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.

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 Industrial Tape 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.

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 product covered by this document does 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).

Volatile Organic Compounds (VOC's)

Mactac product covered by this document is 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's.

EU Regulations

REACH - Substances of Very High Concern (SVHC)

Mactac Industrial 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.

SCIP - Substances of Concern In articles as such or in complex objects (Products)

SCIP is the database for information on Substances of Concern In articles as such or in complex objects (Products) 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.

Restriction of Hazardous Substances in Electrical and Electronic Equipment - RoHS (1, 2 & 3)

Mactac Industrial products 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)

Based on supplier information, formulation and manufacturing process, Mactac product covered by this document also complies with the chemical requirements of China RoHS. No analytical testing or laboratory verification has been performed.

Persistent organic pollutants (POPs)

Mactac 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)**.

EU Packaging Directive – EU 94/62/EC

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.

Mactac 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.

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.

TSE/BSE

Mactac products manufactured using acrylic adhesives do not contain Animal Derived Materials.

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

Several U.S. states have adopted varying laws prohibiting the manufacture, known distribution, or sale of products containing intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS)

Based on supplier information, formulation, and manufacturing practices, Mactac Industrial products do not contain intentionally added Organic Fluorine Compounds including PFAS (Per- and polyfluoroalkyl) and PFOS (Perfluorooctanesulfonic) substances.

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 the 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 Industrial products:

- 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
- Ozone Depleting Substances
- Parabens
- Phthalate Plasticizers, including DEHP, DINP, DIDP, DnOP, DnHP, BBP, DBP, DIBP, DCHP
- Polychlorinated Biphenyls (PCBs)
- Short-chained Chlorinated Paraffins (SCCP)
- Tri Nonyl Phenyl Phosphite (TNPP)

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