

Spinnaker Regulatory Status

Products with Rubber-Based Adhesive

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Product Identification

Product Classification

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 used on Spinnaker products 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 Spinnaker product utilizing hotmelt adhesives comply with Prop 65 by notifying Customers that, after evaluation of the nature of our products and our manufacturing processes, Spinnaker products with rubber-based hotmelt adhesives, do 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”.

Spinnaker does not perform tests, nor requires vendors to do so. 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. This statement applies to all Spinnaker items utilizing rubber-based hotmelt adhesive, except for the items 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. This chemical is known to be present in the non-top coated direct thermal papers utilized in the Spinnaker products 50121-00.00S and 50124-00.00S. However, this product containing BPS is being discontinued from Spinnaker’s portfolio.

Spinnaker, a Mactac company, complies with regulatory labeling requirements for Prop 65.

Volatile Organic Compounds (VOC’s)

Spinnaker products using Rubber-Based adhesives are coated from 100% solids. 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.

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.

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 are not manufactured with the addition of the above listed chemicals.

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).

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.

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 173-337-114.

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.

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.

Of these 25 chemicals, 24 are not used in the manufacture of Spinnaker products that use Hotmelt rubber-based adhesives. 1,3-Butadiene (commonly called “butadiene”), which is on EPA’s high-priority list, is used as a starting material for a rubber in rubber-based adhesives. After polymerization and downstream processing at the supplier and at Spinnaker, any residual monomeric 1,3-butadiene would be expected to be present at negligible concentrations in the finished adhesive and in finished Mactac products.

EU Regulations

REACH - Substances of Very High Concern (SVHC)

Spinnaker 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.

The products utilizing rubber based adhesives do not contain intentionally added Substance of Very High Concerned (SVHC)* as published by the European Chemicals Agency (ECHA) on November 5th, 2025, 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.

This statement applies to all Spinnaker items utilizing rubber-based hotmelt adhesive, except for the item 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 Spinnaker products 50121-00.00S and 50124-00.00S.

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.

EU Packaging Directive – EU 94/62/EC

At this time, Spinnaker, a Mactac company, 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.

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

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)**.

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

Spinnaker 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, Spinnaker Roll Label products also comply with the chemical requirements of China RoHS. No analytical testing or laboratory verification has been performed.

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

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.

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 utilizing Rubber-based Adhesives:

Our rubber bases adhesives 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 rubber-based adhesives.

TSE/BSE

The **rubber-based adhesive** utilized by Spinnaker does 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 the 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 rubber adhesives identified on this letter:

- Azo Dyes
- Bisphenol A (BPA)
- Bisphenol S (BPS) *
- Brominated Flame Retardants
- Chlorinated compounds (excluding products with vinyl face stocks)
- Dimethyl Fumarate
- Dioxins
- Epoxy Derivatives
- Halogenated compounds
- Melamine
- Natural Rubber or Natural Rubber Latex
- Nano Materials
- Ozone Depleting Substances
- Polychlorinated Biphenyls (PCBs)
- Phthalate Plasticizers, including DEHP, DINP, DIDP, DnOP, DnHP, BBP, DBP, DIBP, DCHP
- Polyvinyl Chloride (except for products utilizing PVC face stock)

*See pages 4 and 7 "Bisphenol – S"

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