REACH – CANDIDATE LIST SUBSTANCES OF VERY HIGH CONCERN (SVHC)

The European Chemical agency (ECHA) website lists those substances that have been designated as "Candidate List Substances" by the ECHA Member States' Committee which was last updated on 20.06.16

In accordance with the procedure set out under the REACH Regulation (EC) No 1907/2006 those substances may become subject to authorisation. Business operators are obliged to make available certain information to downstream businesses and to final consumers, if their goods contain any of the "Candidate List Substances" in a concentration above 0.1% w/w.

Substances that become subject to Authorisation and Restriction (in the case of certain articles) under the procedure set out in Articles 55−59 of the Regulation will be included in Annex XIV.

The Court of Justice of the European Union (CJEU) had a ruling on 10th September 2015 that now clarifies the definition of an "article[1]". Now the threshold limit 0.1% w/w for a substance of very high concern (SVHC) under REACH applies to each individual article within an entire article rather than just to the whole article itself.

So in the case of a typical self-adhesive laminate it would be made up of two articles:
- face and adhesive make one article
- liner and silicone make one article.

UPM Raflatac confirms that during manufacture of our products we do not add any of the "Candidate List Substances" and that based on information from our supply chain the products do not contain any "Candidate List Substance" in an amount exceeding the 0.1% w/w concentration threshold as specified in Article 33 with the exception of the following:

- The face materials below contain in the coating boric acid CAS 10043-35-3. This is used as a cross-linking agent. The filmic supplier has declared that content of boric acid may exceed 0.1% w/w in the film itself.

  PP Inkjet Silk White On-Demand (EBJ), PP Inkjet Gloss Clear On-Demand (EBH), PP Inkjet Gloss White On-Demand (EBI), Polyjet Gloss White On-Demand (AIS) and Polyjet Gloss White (AIR).

  After the laminate is converted to labels, the single label consisting of the above mentioned face material and the adhesive may exceed the 0.1% w/w limit. The above mentioned films have been through a screening test by an external laboratory for SVHC's including boric acid CAS 10043-35-3 and none was detected above reporting limits.

- All face materials coated with the adhesives RP31C and RP38 may contain the substances:
  Nonyl phenol ethoxylate, CAS 68412-54-4 and 4-(1,1,3,3-tetramethylbutyl) phenol, ethoxylated, CAS 9002-93-1 above 0.1% w/w in the face and adhesive. The adhesive RP38 has been through a screening test by an external laboratory for SVHC's including above mentioned chemicals and none was detected above reporting limits.

The information provided is based on a review of the material safety data sheets and supplier surveys. Please note that we do not routinely test our products to confirm the presence or absence of SVHC.

1. An article is the legal term under REACH and is defined as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition" Article 3(3).

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