



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).

Prop 65

Spinnaker products that utilize rubber-based adhesives comply with the California Safe Drinking Water and Toxic Enforcement Act of 1986, commonly known as Proposition 65. A warning label is not required on the basis that there is no exposure to any Proposition 65 substances in known applications.

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.

Uyghur Forced Labor Prevention Act

Raw material sourced by Spinnaker are not sourced from companies or persons located in the Xinjiang Uyghur Autonomous Region (XUAR) pursuant to the Uyghur Forced Labor Prevention Act of 2021.



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



Volatile Organic Compounds (VOC's)

Spinnaker products are coated from 100% solids or 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.

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 June 27th, 2024, 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)

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)

Spinnaker products are not tested for the above mentioned substances.



Persistent organic pollutants (POPs)

Spinnaker products do not contain intentionally added Persistent organic pollutants (POPs) according to 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.

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

Spinnaker Products utilizing Rubber-based Adhesives:

According to supplier information, Spinnaker products utilizing rubber-based adhesive contain Mineral Oil Saturated Hydrocarbons (MOSH).

The base oil used on the rubber-based adhesives has been evaluated by IP 346 (Determination of Polycyclic Aromatics - DMSO extractables) with a result < 3% DMSO extractables. Per ECHA, classification as carcinogen need not apply because it can be shown substance contains < 3% DMSO extract per IP 346.



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.



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)

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 [SPIN-Regulatory Mailbox](#).