

## **P- 661 Regulatory Compliance Letter**

### **EU Directive 2011/65/EU & 2012/19/EU**

Shurtape® P- 661 Pressure Sensitive Tape is outside the scope of the requirements set forth by European Union Directive 2011/65/EU – ROHS II and the European Union Directive 2012/19/EU – WEEE relating to electronics and electrical equipment which bans or limits certain heavy metals and polybrominated flame retardants; however, Shurtape® confirms due diligence has been performed through careful review of raw material specifications, vendor certifications and random testing to insure its product does not contain heavy metals, Polybrominated Biphenyls (PBBs), or Polybrominated Diphenyl Ethers (PDBEs) as unintended impurities in concentration exceeding EU regulatory limits.

### **EU Directive 2013/2/EU**

P- 661 meets European Union Directive 2013/2/EU in regards to packaging standards, which restrict quantities of Lead (Pb), Cadmium (Cd), Mercury (Hg) and Hexavalent Chromium (Cr(VI)). Raw materials utilized in the production process may contain unintended impurities that include the aforementioned heavy metals.

### **TPCH**

Shurtape® certifies that all packaging and packaging components sold or provided, whether separately or included with finished product are in compliance with the Model Toxics in Packaging Legislation and with other state and federal legislation regarding toxics in packaging.

- 1) We certify that the regulated metals – lead, mercury, cadmium, and hexavalent chromium – were not intentionally added to any package or packaging component during the manufacturing process.
- 2) We further certify that the sum of the incidental concentration levels of lead, mercury, cadmium and hexavalent chromium present in any package or package component does not exceed 100 parts per million by weight.
- 3) We further certify that no materials used to replace the heavy metals are present in a quantity or manner that creates a hazard as great as or greater than the hazard created by the regulated metals.
- 4) We have and will maintain documentation supporting this certification, including test results, and will make them available to you upon request.

### **California Proposition 65**

Shurtape® hereby certifies that, to the best of its knowledge, this product does not contain chemicals known to the State of California to cause cancer or reproductive toxicity (“Proposition 65 Chemicals”) at levels which would require a warning.

**FDA**

P- 661 is not appropriate for use in applications where the product could potentially become a direct or indirect food additive. Therefore, this product should not be used in such a manner that would result in contact either directly or indirectly with food.

**JIG-101 Ed 4.0**

P- 661 is compliant with JIG-101 standards.

**Asbestos**

Asbestos is not used as a component in any Shurtape® product.

**REACH SVHC**

P- 661 is an article as defined by Article 3(3) of Regulation (EC) 1907/2006 (REACH). As an article, the product is not subject to the Safety Data Sheet requirements outlined in Article 33(1) of the same Regulation. P- 661 does not have an intended release of a chemical substance, is not a chemical mixture, and is not subject to pre-registration or the registration process.

P- 661 contains no “substances of very high concern” (SVHC) in a concentration above 0.1% (w/w) as promulgated 28 October 2008 (REACH Article 59) on the Candidate List of Substances of Very High Concern (REACH Annex XIV) inclusive of updates through June 2016. Shurtape® continues to monitor the SVHC list and its updates.

**Illegal Practices, Human Trafficking**

To the best of its knowledge, Shurtape® is compliant with all local and federal laws governing labor practices and does not knowingly source materials from suppliers that are engaged in illegal practices or human trafficking.

**Animal Testing**

Shurtape® is pleased to confirm that no animal testing is performed on any Pressure Sensitive Tape manufactured by Shurtape® Technologies, LLC or its subsidiaries.

**Conflict Minerals**

Shurtape® products are outside the scope of the SEC's Conflict Minerals Rule (Dodd-Frank Section 1502). Shurtape® confirms due diligence has been performed through careful review of raw material specifications and vendor certifications to insure its product does not contain Tungsten, Tantalum, Gold and Tin as intentional raw materials or in the manufacturing process of Shurtape® products. Additionally, raw materials used to manufacture Shurtape® products are not sourced from Democratic Republic of Congo or adjoining countries.

**Latex**

P- 661 is manufactured with treated textile fabric and coated with synthetic rubber adhesive. However, P- 661 is produced in a facility that utilizes natural rubber to manufacture other products. As such, trace latex contamination is possible.

**Allergen**

Upon careful review of all raw material components that compose P- 661 pressure sensitive tape, Shurtape® has concluded that this product does not contain materials based on or derived from milk, eggs, wheat, fish, crustaceans, soybean, tree nuts, or peanuts nor are any of these materials used in the manufacturing process.

**Dimethyl Fumarate**

Dimethyl Fumarate (DMF) CAS #624-49-7 is neither intentionally added as a raw material, nor used in the manufacturing process of Shurtape® Pressure Sensitive Tapes. DMF is not expected to be present in concentrations above 0.1 mg/kg in such products or any part.

**Bisphenol A**

Bisphenol A (BPA) CAS #80-05-7 is neither intentionally added as a raw material, nor used in the manufacturing process of Shurtape® Pressure Sensitive Tapes.

Shurtape® recommends the user determine whether the product is fit for the users' specific purpose and is suitable for the users' method of application.

Should you have further questions regarding the usage of these products, please contact the EHS Department at 828-322-2700 or via email at [mbranch@shurtape.com](mailto:mbranch@shurtape.com) .

Sincerely,

*Misty Branch*

Environment, Health & Safety  
Regulatory Specialist

Origination/Revision Date: 6/27/2016