

April 2025

Kortho Foils Statement Regarding Regulatory Compliance of Stamping Foils

To whom it may concern,

During the manufacture of Foils, Kortho does not intentionally introduce (that is does not deliberately utilise during the manufacture of the Foils a material or component where its continued presence is desired in the final product to provide a specific property, appearance or quality) any of the substances scheduled in the regulations or laws listed in Annex 1.

These substances may only be present as adventitious trace impurities (not intentionally added to the product) in amounts, as the case may be, not expected to exceed the allowable concentrations of the referenced documents and we do not analyse the product for these substances.

Furthermore, in accordance with the information provided by our suppliers and in conjunction with the Kortho proprietary product formulations, Kortho foils do not contain any of the chemicals listed in Annex 2.

Additionally, Annex 3 provides recommendations on further laws and regulations.

Yours faithfully,

Kortho Coding & Marking
Compliance Department

export@kortho.nl

Annex 1

REGULATION (EU) 2017/999 of 13 June 2017 amending annex XIV to regulation (EC) No. 1907/2006 of the European Parliament and Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH): as articles, Kortho stamping foils do not contain any substances listed on the latest ECHA Substance of Very High Concern list in a concentration above 0.1% (w/w).

DIRECTIVE 94/62/EC of 20 December 1994 on packaging and packaging waste (PPW): the sum of concentration levels of lead, cadmium, mercury, and hexavalent chromium in Kortho foils do not exceed 100 parts per million.

DIRECTIVE EU 2015/863 of 31 March 2015 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS 3): Kortho foils do not contain any of the restricted substances referred to in Article 4(1) with maximum concentration values tolerated by weight in homogeneous materials as shown below:

- Lead (0.1 %)
- Mercury (0.1 %)
- Cadmium (0.01 %)
- Hexavalent chromium (0.1 %)
- Polybrominated biphenyls (PBB) (0.1 %)
- Polybrominated diphenyl ethers (PBDE) (0.1 %)
- Bis(2-ethylhexyl) phthalate (DEHP) (0.1%)
- Butyl benzyl phthalate (BBP) (0.1%)
- Dibutyl phthalate (DBP) (0.1%)
- Diisobutyl phthalate (DIBP) (0.1%)

REGULATION (EU) No 1272/2013 of 6 December 2013 amending (EC) No 1907/2006 as regards polycyclic aromatic hydrocarbons (PAH): Kortho foils do not contain more than 1 mg/kg (0.0001 % by weight of the component) of any of the listed PAHs.

DIRECTIVE 2003/11/EC of 6 February 2003 relating to restrictions on the marketing and use of certain dangerous substances and preparations (pentabromodiphenyl ether, octabromodiphenyl ether): Kortho foils do not contain bromine compounds in concentration higher than 0.1% w/w.

DIRECTIVE 2005/84/EC of 14 December 2005 relating to restrictions on the marketing and use of certain dangerous substances and preparations (phthalates in toys and childcare articles): Kortho foils do not contain phthalate compounds in concentration higher than 0.1% w/w.

DIRECTIVE 2006/122/EC of 12 December 2006 relating to restrictions on the marketing and use of certain dangerous substances and preparations (perfluorooctane sulfonates): Kortho foils do not contain perfluorooctane sulfonates in concentration higher than 0.1% w/w.

REGULATION (EC) No 1223/2009 of 30 November 2009 on cosmetic products: Kortho foils do not contain any of the allergenic fragrance substances listed.

Annex 1 continued

REGULATION (EC) No 850/2004 of 29 April 2004 on persistent organic pollutants: Kortho foils do not contain any of the POP substances listed on the Stockholm list current on the date of this document.

REGULATION (EC) No 1005/2009 of 16 September 2009 on substances that deplete the ozone layer: Kortho foils do not contain any of the controlled substances listed in Annex I and II.

Toy Standard EN-71-3:2013 + A3:2018 Migration of Certain Elements: this standard specifies limits for the migration of certain elements from toys. On request and by agreement, Kortho can provide specific information to enable risk assessments, which may be necessary to evaluate compliance with the Toy Safety Directive.

Exclusion Policy for Printing Inks and Related Products of the European Printing Inks Association (EuPIA - 2015): Kortho foils do not contain any substances listed on the EuPIA exclusion list.

Model Toxics in Packaging Legislation (formerly CONEG): the sum of the concentration levels of incidentally introduced lead, cadmium, mercury, and hexavalent chromium in Kortho foils do not exceed 100 parts per million.

California Safe Drinking Water and Toxic Enforcement Act 1986 (Proposition 65): any chemicals which are used by Kortho as processing aids during the manufacture of its products, and which are listed on the State of California Proposition 65 list, are removed during the manufacturing process leaving only trace quantities which fall well below the limits specified by the regulation.

United-States Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act), section 1502 on Conflict Minerals (formerly known as the Congo Conflict Minerals Act): Kortho foils do not contain Tantalum, Tin, Gold and Tungsten.

Annex 2

Flame Retardants

	CAS No.
• 2,2-Bis (bromomethyl) propane-1,4-diol	3296-90-0
• Decabromo-diphenylethane (DBDPE)	84852-53-9
• Dibutyltin dilaurate	77-58-7
• Dioctyltin oxide	870-08-6
• Polybrominated-biphenyls (PBBs)	59536-65-1, 67774-32-7
• Polybrominated-biphenyl ethers (PBBEs)	1163-19-5, 32534-81-9, 32536-52-0
• Polychlorinated terphenyls (PCTs)	61788-33-8
• Tetrabromobisphenol A(TBBPA)	79-94-7
• Tributyl phosphate (TBP)	126-73-8
• Tri-o-cresyl phosphate	78-30-8
• Triphenyl phosphate (TPP)	115-86-6
• Tris (aziridinyl) phosphin oxide	545-55-1
• Tris (1,3-dichloro-2-propyl) phosphate (TDCPP)	13674-87-8
• Tris (2-butoxyethyl) phosphate (TBEP)	78-51-3
• Tris (2,3-dibromopropyl) phosphate	126-72-7
• Tris (2-chloroethyl) phosphate (TCEP)	115-96-8
• Tris (2-chloro-1-methylethyl) phosphate (TCPP)	13674-84-5
• Tris (2-ethylhexyl) phosphate (TEHP)	78-42-2

Polycyclic Aromatic Hydrocarbons (PAH)

	CAS No.
• Acenaphthene	83-32-9
• Acenaphthylene	208-96-8
• Anthracene	120-12-7
• Benzo[g,h,i]perylene	191-24-2
• Fluoranthene	206-44-0
• Fluorene	86-73-7
• Indeno[1,2,3-cd]pyrene	193-39-5
• Naphthalene	91-20-3
• Phenanthrene	85-01-8
• Pyrene	129-00-0

Other

	CAS No.
• Alkanes, C10-13, chloro (Short chain chlorinated paraffins)	85535-84-8
• Allergen-containing substances (Food allergens U.K listing)	
• Antimony trioxide	1309-64-4
• Arsenic (and arsenic compounds)	7440-38-2
• Azo compounds with carcinogenic amino compounds	

Annex 2 continued

Other continued

	CAS No.
• Benzene	71-43-2
• Benzophenone	119-61-9
• Beryllium (and beryllium compounds)	7440-41-7
• Bisphenol A	80-05-7
• Chlorinated paraffins	85535-85-9
• C.I. Red 114	6459-94-5
• C.I. Yellow 14	842-07-9
• Cobalt chloride	7646-79-9
• Cobalt nitrate	10141-05-6
• 2,4-Diaminotoluene	95-80-7
• N,N-Diethylhydroxylamine (DEHA)	3710-84-7
• 3,3-Dimethoxybenzidine	119-90-4
• Dimethylformamide (DMF)	68-12-2
• Dimethylfumarate (DMFu)	624-49-7
• Formaldehyde	50-00-0
• Formamide	75-12-7
• Gluten proteins	8002-80-0
• 2-Isopropylthioxanthone (ITX)	5495-84-1
• Lactose	63-42-3
• Latex rubber	9006-04-6
• Melamine	108-78-1
• 4-Methylbenzophenone	134-84-9
• Mineral oils	8042-47-5
• Nanomaterials	
• Nickel	7440-02-0
• Nonylphenol	25154-52-3
• Organostannic compounds including compounds of Dibutyltin (DBT), Dioctyltin (DOT), Tributyltin (TBT), Triphenyltin (TPT)	
• PFAS (per- and poly-fluoroalkyl substances)	
• PFHxS	355-46-4
• Phenolic resins	9003-35-4
• Polyvinyl chloride (PVC)	9002-86-2
• Polyvinylidene chloride (PVDC)	9002-85-1
• Red phosphorus	7723-14-0
• Selenium (and selenium compounds)	7782-49-2
• Silicones	63148-62-9
• Synthetic mineral fibres classified as carcinogenic	
• Triclosan	3380-34-5

Annex 3

Food Safety

Many Kortho grades are tested and approved to EU and Swiss regulations for use in direct contact with foodstuffs and an ongoing testing programme is maintained, including taint/odour tests. Further details are given in Kortho document reference LIVN-REG-SUB-89. With non-approved grades, compliance in accordance with any relevant regulation can be ensured where there are appropriate measures taken to prevent direct food contact.

Vegan/GMO/BSE/TSE

The product is wholly derived from raw materials of mineral, vegetal or synthetic origin. Ingredients of animal origin are not employed in the units where it is manufactured or processed. The exception is that trace quantities of beeswax are used in some grades of foil.

Therefore, we have no reason to expect the possibility of contamination by BSE (bovine spongiform encephalopathy) and / or TSE (transmissible spongiform encephalopathy).

Our suppliers declare all ingredients are free of GMO (genetically modified organisms).