

Declaration of non use of

Per- and polyfluoroalkyl substances (PFAS) of concern

The family of per- and polyfluoroalkyl substances (PFAS) contains more than 4.000 compounds. The overwhelming majority of these PFAS, especially those which are considered to be of concern, including raw materials which may contain these PFAS, are not used at all in Siegwerk products. Amongst these, those perfluorocarbons of most concern:

- **Perfluorooctane sulfonates (PFOS)**, $C_8F_{17}SO_2X$ ($X = OH$, Metal salt (O-M+), halide, amide and other derivatives including polymers)
- **Perfluorocarboxylic acids (PFCA) and their salts**, such as Perfluorooctanoic acid (PFOA, $C_7F_{15}COOH$), Perfluorononanoic acid (PFNA, $C_8F_{17}COOH$), Perfluorodecanoic acid (PFDA, $C_9F_{19}COOH$) and their salts (perfluorooctanoates, perfluorononanoates, perfluorodecanoates)
- **Precursors of the above (“fluorotelomers”)**
- **Fluorotelomeralcohols (FTOH)**, i.e. 8:2 FTOH ($=C_8F_{17}CH_2CH_2OH$)

However, the presence of potential traces of these substances in Siegwerk products originating from raw material impurities or as adventitious contaminants cannot be excluded. We proactively monitor and/or retrieve supplier data on impurities in raw materials likely to contain traces of toxicological and ecotoxicological concern. We can assure you that, according to the present scientific knowledge, potential traces of perfluorocarbons of concern in our products, if any, are well below 0.1%.

Please note that **Polytetrafluoroethylene (PTFE, CAS 9002-84-0)** may be used as wax compound in certain solvent based, water based, conventional offset or UV/EB curing inks and varnishes in order to improve scratch resistance.

The safe use of PTFE in inks is safeguarded due to its polymeric nature and high molecular weight, leading to a very minute migration potential. The polymer is toxicologically evaluated and listed in Part A of the Swiss (EDI) “Ordinance on Materials and Articles Intended to Come in Contact with Foodstuffs”, without any specific restriction. An OML of 60 mg/kg is applicable.

Since July 4, 2020, the EU POP Regulation (Regulation (EU) 2019/1021 on persistent organic pollutants) sets a general limit for PFOA (perfluorooctanoic acid, CAS 335-67-1) including its salts to 25 ppb. All of Siegwerk’s raw materials comply with this limit irrespective of the region of use.

Additionally national legislation would need to be observed in terms of PTFE use.

- As of July 1, 2020, Denmark has banned PFAS chemicals (including PTFE) in paper and board food packaging. Order No. 681 of May 25, 2020, prohibits the use of such substances unless a functional barrier prevents migration into the food.



- In the US during 2021 the Toxics in Packaging Clearinghouse (TPCH) (= former Coalition of Northeastern Governors, CONEG) model legislation was amended and, amongst other substances, perfluoroalkyl and polyfluoroalkyl substances (PFAS) were added to its list of prohibited chemicals in packaging. This prohibition applies to the “intentional introduction” of these substance into packaging and packaging components. At this time, no states have enacted the updated TPCH model legislation.

Please contact your technical support for any PTFE-related questions.

The information in this document reflects Siegwerk’s policy and commitments. This statement is valid without signature.