

REACH – candidate list substances of very high concern (SVHC)

For label materials manufactured by UPM Adhesive Materials in EMEA

The European Chemical Agency (ECHA) website lists those substances that have been designated as “Candidate List of Substances” by the ECHA Member States’ Committee which was last updated on **November 5, 2025**

In accordance with the procedure set out under the REACH Regulation (EC) No 1907/2006 for those substances that 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 September 10, 2015 that now clarifies the definition of an “article1”. 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:

- The face and adhesive together constitute one article.
- The liner and silicone together constitute another article

UPM Adhesive Materials confirms based on information from our supply chain that its label materials 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:

Thermal papers listed below contain the substance 4,4'-sulphonyldiphenol (Bisphenol S) CAS no: 80-09-1 in a concentration above 0.1% (w/w).

Name	Sales code
RETAIL ECO BPA FREE NXT+ FSC	GGH
THERMAL DURABLE P 300-FSC	HCU
THERMAL ECO BPA FREE NXT+CO2N-FSC	IJZ
THERMAL ECO BPA FREE NXT+FSC	GGG
THERMAL ECO BPA FREE-FSC	BZE
THERMAL ECO CARD 100 BPA FREE-FSC	HGM
THERMAL TOP 200-FSC	HHM
THERMAL TOP FOOD NXT+CO2N-FSC	IKA
THERMAL TOP FOOD NXT+FSC	HCG
THERMAL TOP LOGISTICS NXT+FSC	HHQ
THERMAL TOP OPTI 200-FSC	JKW

Name	Sales code
THERMAL TOP OPTI P 180-FSC	JKX
THERMAL TOP OPTI P 200-FSC	JKY
THERMAL TOP P 180-FSC	DZA
THERMALITE TOP 200-FSC	FZA
THERMALITE TOP OPAQUE BLACK 200-FSC	FZB

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's.

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".

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