



Alligo Group Chemical Requirements

Ver. 2026.1 – Electronics and other goods

Introduction

This document contains information to suppliers (producers, importers and traders) regarding legal requirements and restricted substances in Electric and Electronic Equipment (EEE), tools, supplies, chemicals and similar products purchased by Alligo Group which will hereon in this document be referred to as Alligo.

The Alligo Chemical Requirements constitutes a part of Alligo Supplier Agreement and is applicable to all orders and products delivered to Alligo. The supplier is obliged to inform all its sub-suppliers and subcontractors of the chemical requirements throughout the supply chain and enforce full implementation of the same.

For further information, comments or questions, please contact Alligo quality department at: info@swedol.se.

Legal Requirements

REACH – European Parliament and Council Regulation (EC) No 1907/2006

REACH is the European Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals. It entered into force in 2007, replacing the former legislative framework for chemicals in the EU. The main aims of REACH are to ensure a high level of protection for human health and the environment, including the promotion of alternative test methods.

REACH affects all EU-actors that professionally manufacture, import, sell, buy, distribute or use chemicals as such and in articles. Thus, Alligo require that all our suppliers comply with REACH and other EU legislation.

Registration

One of the requirements of REACH is that manufactures of chemicals and importers of chemicals and articles have a duty to register, for each legal entity, substances on their own, or in preparations that they produce or import in quantities over 1000 kg per year (per manufacturer/importer), unless the substances is exempt from registration. For importers of articles registration requirements apply to substances intentionally released from articles under certain conditions, in which case the article producer/importer is responsible for the registration.

Duty to Inform on Substances for Authorization and registration in the SCIP-database



All EU-actors that professionally manufacture, import, sell or distribute articles are legally obliged to inform their customer about the presence of a Candidate List substance of very high concern, SVHC-substance, in articles placed on the market.

Since 5 January 2021 all articles containing SVHC-substances must be registered in the SCIP-database established under the Waste Framework Directive 2008/98/EC.

All suppliers are requested to follow updated information on the website of the European Chemicals Agency (ECHA): <http://ECHA.europa.eu>.

The Candidate List (SVHC): <https://echa.europa.eu/candidate-list-table>

The Authorization List (Annex XIV): <https://echa.europa.eu/authorisation-list>

SCIP-database: <https://echa.europa.eu/scip>

Information required regarding products

1. Any substances from the Candidate List (SVHC) present above 0.1% in articles (refers to any individual part of an article) delivered to Alligo shall be declared. Please list these substances by name, CAS RN and concentration (% or mg/kg).
2. Articles containing SVHC-substances need to be registered in the SCIP-database. Please, provide us with the registration number, SCIP-number, for all relevant articles.

Information regarding products shall be sent to mikaela.johansson@alligo.com as well as your contact person in purchasing within Alligo.

CLP-Regulation (EC) No 1272/2008 including the amendments in Regulation (EU) 2024/2865

The Regulation on classification, labelling and packaging of substances and mixtures aligns existing EU legislation to the United Nations' Globally Harmonized System (GHS). CLP is legally binding across the Member States and directly applicable to all industrial sectors. It requires manufacturers, importers or downstream users of substances or mixtures to classify, label and package their hazardous chemicals appropriately before placing them on the market.

https://ec.europa.eu/growth/sectors/chemicals/legislation_en
<https://echa.europa.eu/regulations/clp/understanding-clp>



Biocidal products (BPR), Regulation (EU) 528/2012

The Biocidal Products Regulation concerns the placing on the market and use of biocidal products. This regulation aims to improve the functioning of the biocidal products market in the EU, while ensuring a high level of protection for humans and the environment. All biocidal products require an authorization before they can be placed on the market, and the active substances contained in that biocidal product must be previously approved.

<https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr>

RoHS, Directive 2011/65/EU

This directive restricts the use of certain hazardous substances in electrical and electronic equipment (EEE) and promotes the collection and recycling of such equipment. The requirements have been gradually extended to include all electric and electronic equipment (EEE), it will be fully implemented by 22 July 2019, except for explicit exclusions. The recast (RoHS 2) came into force 2011.

http://ec.europa.eu/environment/waste/rohs_eee/legis_en.htm

Batteries & Accumulators, Regulation (EU) 2023/1542 repealing Directive 2006/66/EC

The new batteries regulation aim to make batteries sustainable throughout their entire life cycle – from the sourcing of materials to their collection, recycling and repurposing. The regulation harmonizes the requirements for placing batteries and accumulators on the market. It encompasses all kinds of batteries and accumulators, with some small exceptions. Within the directive is also legislation for waste batteries and accumulators.

<http://ec.europa.eu/environment/waste/batteries/index.htm>

Regulation (EU) 2025/40 on Packaging and packaging waste (PPW) repealing Directive 94/62/EC

Note that this regulation is repealing the old Directive 94/62/EC, 18 months after the new regulation enters into force. Regulation (EU) 2025/40 was adopted to harmonize national measures concerning the management of packaging and packaging waste and to prevent or reduce its impact on the environment and cover the entire packaging life cycle.



<http://ec.europa.eu/environment/waste/packaging/legis.htm>

POPs, Regulation (EC) No 2019/1021

Persistent organic pollutants (POPs) are chemical substances that persist in the environment, bioaccumulate through the food web, and pose a risk of causing adverse effects to human health and the environment. This group of priority pollutants consists of pesticides (such as DDT), industrial chemicals (such as polychlorinated biphenyls, PCBs) and unintentional by-products of industrial processes (such as dioxins and furans).

http://ec.europa.eu/environment/chemicals/international_conventions/index_en.htm

Ozon-depletion, Regulation (EU) No 2024/590, repealing Regulation (EC) No 1005/2009

This Regulation lays down rules on the production, import, export, placing on the market, use, recovery, recycling, reclamation, and destruction of substances that deplete the ozone layer.

<https://eur-lex.europa.eu/eli/reg/2024/590/oj>

Fluorinated greenhouse gases, Regulation (EU) No 2024/573 repealing Regulation (EU) No 517/2014

The objective of the regulation is to protect the environment by reducing the emissions of fluorinated greenhouse gases. It establishes rules on containment, use, recovery, recycling, reclamation and destruction of fluorinated greenhouse gases. It also imposes conditions for import, export, placing on the market, supply, and use of fluorinated greenhouse gases.

Note! Regulation (EU) No 2024/573 has repealed Regulation (EU) No 517/2014, however some rules will continue to apply for some time.

[Regulation - 517/2014 - EN - EUR-Lex \(europa.eu\)](#)

[Regulation - EU - 2024/573 - EN - EUR-Lex \(europa.eu\)](#)

Implementation

The supplier is fully liable for compliance with the requirements specified in this document. The supplier is advised to carry out their own risk assessments and self-



reference tests of products and/or materials for chemicals content and other aspects as necessary, on their own expense.

Alligo will carry out due diligence testing to verify compliance. In case of non-compliance with the Chemical Requirements, appropriate actions need to be discussed with Alligo without delay. The supplier will be liable for all costs occurred related to a non-compliance due to negligence or carelessness.

Please note! Comments on chemical guide.

The chemical guide below is first and foremost constructed for electronic and electric equipment. However, the guide can be used for most other goods, products and supplies that Alligo retail and should be considered for all products, except textiles and leather. For textiles and leather, the chemical guide specifically for textiles and leather should be advised.

January 2026

Main changes in the EEE Chemicals Guidance

All changes except layout changes, are marked in the “marked changes” version of the Chemicals guidance.

The guidance is updated regarding layout and design, but that is not shown as changes in the “marked changes version”. Also, the tables in appendixes are updated regarding the layout without marked changes.

The following restrictions have been added/updated or in other ways changed:

- The updated limit values in POPs regulation regarding flame retardants PBDEs is added.
- Zinc pyrithione is no longer approved in PT2 Biocide regulation, however zinc pyrithione is already included in the guidance.
- Isopropylated phosphate (3:1) 68937-41-7 is *not* listed in the candidate list why that information is deleted (former misprint)
- The packaging directive is deleted and replaced by packaging regulation
- Battery directive is deleted.
- Irganox 907: 71868-10-5 is added under heading Photo-initiators (SVHC from 2020)
- One missing SVHC lead compound is added to appendix 6
- All information regarding restrictions outside EU is deleted from the guidance.

The following SVHC from November 2025 and February 2026 have been added:

- DBDPE, 1,1'-(ethane-1,2 diyl)- bis[pentabromobenzene] 84852-53-9 is added under heading *Flame retardants – Decabromodiphenylethane (DBDPE)*
- Bisphenol AF; 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol: 1478-61-1 is added under heading Bisphenols

Other informative updates

- Information that MCCP and C14-C21 are included in Stockholm convention (but yet not regulated under POPs regulation)
-

Clarifications and language corrections have been done to improve understandability.

THE SWEDISH CHEMICALS GROUP AT RISE

CHEMICALS GUIDANCE EEE

Information on authorization and restrictions of substances used in electrical and electronic processes and products

Edition: JANUARY 2026





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PREFACE

This guide is developed for the members of the Swedish Chemicals Group to facilitate for importing companies to comply with national and EU chemical legislation and recommendations in the fields electric and electronic equipment.

Many chemicals used throughout the manufacturing chain can be harmful for the environment, factory workers and consumers. Therefore, an increasing number of chemicals are being restricted and all importers and distributors are responsible for the articles they put on the EU market.

This guide has been put together by a team of experts at RISE and is updated twice per year. The guide covers EU regulated chemical substances affecting electric and electronic equipment as well as national legislation in Europe.

The distinguishing properties of the chemicals of concern and the processes in which they are used are described in the guide, sometimes along with information of alternatives. Stipulated test equipment for analysis of restricted substances in products is given when available.

The guide is provided in English and Chinese that can be accessed through the Chemical group's website. To facilitate communication, the contents on each page are identical in each linguistic version. The English version of this guide is preferential for interpretation.

EXPLANATORY SECTION

Word list

Required limit value:	Limit value as agreed in business sector and or by legal requirements. Note that limit value is measured in the material of concern.
CAS RN:	Chemical abstract services registration number. CAS RNs are given for specific defined substances.
Properties:	Human toxicological and eco toxicological properties.
Use:	Identified uses on the market.
Comments:	Information on known alternatives and recommendations on how to avoid unwanted chemicals.
Legal background:	Current legal EU and national European frameworks and requirements.
Candidate list:	Substances listed on Candidate List of Substances of Very High Concern for authorization of the Regulation (EC) No 1907/2006 (REACH) are referred to as SVHC. These substances are covered by an information duty if the concentration is 0.1 weight-% (1000 mg/kg) or above in an article. Candidate list substances are also included in the French AGECE legislation (LOI n° 2020-105) implying additional information requirements (same concentration limit).
Test method:	Standardized test method if such exists. ISO/EN standards are prioritized over national and other standards. This guide does not normally list the date of the standard. Make sure that the latest available version of each standard is used. Test equipment is endorsed if no standardized test method exists. Abbreviations of test equipment are explained below. Some chemical substances in the guide are not legally regulated but are still included as part of a larger group of chemicals. Since laboratories may vary in which substances - beyond those that are legally regulated - they offer testing for, this should be confirmed before placing an order.
LOD:	Limit of detection. The lowest concentration of a chemical that can be reliably detected (identified, but not how much) by an analytical procedure.. This can vary between different test laboratories.
LOQ:	Limit of quantification. The lowest concentration of a chemical that can be reliably quantified (how much) by an analytical procedure.
Packaging material:	All products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer.
POP	Persistent Organic Pollutants (POPs) are organic chemical substances, which remain intact in the environment for exceptionally long periods of time.

Test equipment abbreviations

ANALYSES OF ORGANIC COMPOUNDS

- **Gas chromatography: GC**

Detectors used together with GC:

- MS: Mass selective detector: GC-MS
- DAD: Diode array detector: GC-DAD
- ECD: Electron capture detector: GC-ECD

- **Liquid chromatography: LC**

Note: Sometimes the abbreviation HPLC is used. It stands for High Performance Liquid Chromatography.

Detectors used together with LC:

- MS: Mass selective detector: LC-MS
- DAD: Diode array detector: LC-DAD
- ECD: Electron capture detector: LC-ECD
- UV/VIS: Ultraviolet/visible spectrophotometric detector: LC-UV/VIS

ANALYSES OF METALS

- **Inductively Coupled Plasma Spectrometry: ICP**

Detectors used together with ICP:

- OES: Optical emission spectrometer: ICP-OES
- MS: Mass selective detector: ICP-MS

- **Atomic absorption spectrophotometer: AAS**

SCREENING ANALYSES OF ELEMENTS

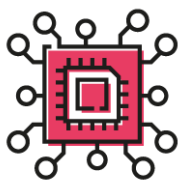




- **X-ray fluorescence, XRF**

Relationship between units used in the guide

1000	mg/kg	equals	1000	ppm	(parts per million)
1000	mg/kg	equals	1 000 000	ppb	(parts per billion)
1000	mg/kg	equals	1 000 000	µg/kg	(microgram per kilogram)
1000	mg/kg	equals	0.1	% (by weight)	

Product and material categories concerned

All chemicals are not used in all materials. A general division into the categories listed below has therefore been made that may be applicable to several kinds of articles due to their material composition

				
Printed wiring board Materials used in components, epoxy boards (PCBs) etc	Metal Metals and metal alloys	Plastics Material made of polymers, like plastics and rubber	Batteries	Packaging Paper cardboard, plastic bags, tags, labels, etc.

PROCESS CHEMICALS

Process chemicals are used in the manufacturing process but have no function in the finished product. Remains of the process chemicals may however be found in the finished product and cause health or environmental problems.

Alkylphenol ethoxylates (APEO) and derivatives

The most common APEOs are Nonylphenol ethoxylates (NPEO) and Octylphenol ethoxylates (OPEO).



Required limit value:	Should not be used in processes.
CAS RN:	Various
Properties:	Irritating to skin. The metabolites affect the respiratory system, have endocrine disruptive effect (hormones) and are dangerous for the environment. Nonylphenol ethoxylates are rapidly degraded to 4-nonylphenol, which is even more dangerous for the environment. A similar environmental danger is the degradation of octylphenol ethoxylate into 4-octylphenol.
Use:	APEO is present in corrosion protective agents, scouring and lubricating agents, cooling and lubricating agents for metal tooling. May be used in paints, lacquers and varnishes in concentrations up to 10% w/w of the mixture. Commercial nonylphenol is used in the production of phenol/formaldehyde resins, plastics, stabilisers, as a catalyst in the curing of epoxy resins (4-Nonylphenol, branched and linear). Octylphenol may still be used (as an antioxidant) in some older formulations of stabilizers for PVC cable jacketing. 4-tert-Octylphenol 140-66-9 may be used as rubber additives.
Comments:	The main alternatives for NPEOs include aliphatic alcohol ethoxylates, both linear and branched, and glucose-based carbohydrate derivatives such as alkylpolyglucoside, glucamides, and glucamine oxides. Note that in this group of alternatives, there might be substances having human and environmental aspects (some branched aliphatic alcohols may be toxic and amine containing substances (like glucamine oxides) may form nitrosamines under certain process conditions).
Legal background:	Legal limit: 0.1% by weight for nonylphenol ethoxylate (NPEO) as a substance or constituent of preparations (closed systems exempted).

Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 46.

Norway restricts manufacture, import, export, sale and use of octylphenol and octylphenol ethoxylates, and mixtures containing these substances, FOR 2004-06- 01-922.

4-Nonylphenol, branched and linear (4-NP, various CAS RN), 4-Nonylphenol, branched and linear, ethoxylated, ethoxylated (4-NPnEO, various CAS RN), 4-(1,1,3,3-tetramethylbutyl)phenol, (4-tert-octylphenol CAS 140-66-9), 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated (4-tert-OPnEO, UVCB substance, no CAS RN), 4-tert-butylphenol (CAS RN 98-54-4) and tris(4-nonylphenyl, branched and linear) phosphite (TNPP) (no CAS RN)) are listed on the Candidate List (REACH).

In France: The substances on the Candidate List as well as 4-tert-pentylphenol (CAS RN 80-46-6), 4-heptylphenol, branched and linear (e.g. CAS RN 1987-50-4), and Reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, trendy and linear (RP-HP) [with ≥ 0.1 % w/w 4-heptylphenol, branched and linear] are included under the AGECE legislation (LOI n° 2020-105).

Several AP and APEO are also included in Annex XIV to REACH.

Test method:

No standardised test method available.

Test equipment: LC-MS, LC-DAD

LOQ: 10 mg/kg

Bisphenols



Required limit value:	Should not present in products.
CAS RN:	Bisphenol A; BPA (4,4'-isopropylidenediphenol): 80-05-7 2,2-bis(4'-hydroxyphenyl)-4-methylpentane: 6807-17-6 Bisphenol B; (4,4'-(1-methylpropylidene)bisphenol): 77-40-7 Bisphenol S; (4,4''-sulphonyldiphenol): 80-09-1 Bisphenol F; (4,4'-dihydroxydiphenylmethane): 620-92-8 Bisphenol AF; 4,4'-[2,2,2-trifluoro-1-(trifluoromethyl)ethylidene]diphenol: 1478-61-1
Properties:	Toxic for reproduction. Endocrine disrupting properties
Use:	Mainly used in manufacture of polycarbonate epoxy resins and chemicals. Also as; hardener in epoxy resins and thermal prints. May be used as catalyst and anti-oxidant for processing PVC.
Comments:	Left as residues in polycarbonate and epoxy. Bisphenols can be found in products with material based on plastic and paper.
Legal background:	<p>BPA, Bisphenol AF, Bisphenol B, Bisphenol S and 2,2-bis(4'-hydroxyphenyl)-4-methylpentane are listed on the Candidate List (REACH).</p> <p>Bisphenol A (BPA) content in thermal paper (0.02w%), is restricted according to Annex XVII of Regulation (EC) No 1907/2006 (REACH), entry 66.</p> <p>In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).</p>
Test method:	No standardised test method available. Test equipment LC-MS, GC-MS. LOQ: 10 mg/kg

C, C' -azodi(formamide) (ADCA)



Required limit value:	Should not be used in processes or present in products.
CAS RN:	123-77-3
Properties:	Allergenic (respiratory sensitizer).
Use:	Azodicarbonamide, or azodiformamide is mainly as blowing agent in the rubber and plastics industry. Blowing agent in especially EVA and PVC.
Comments:	Can leave residues of formamide in the material. ADCA may decompose into semicarbazide a suspected carcinogen. Use physical blowing agents such as carbondioxide, hydrocarbons or nitrogen as alternative to chemical blowing agents when possible.
Legal background:	ADCA is listed on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS, LC-MS. LOQ: 200 mg/kg

Dicumyl peroxide



Required limit value:	Should not be used in processes or present in products.
CAS RN:	80-43-3
Properties:	Toxic for reproduction.
Use:	Crosslinker in plastic and plastic foams (rubber, synthetic rubber, elastomers of PS, PE, PP, EVA), e.g. PEX in cables and EVA in shoes.
Comments:	Can leave residues of acetophenone, 2-phenyl-2-propanol and <i>alpha</i> -methyl-styrene in the material.
Legal background:	Dicumyl peroxide is on the Candidate List (REACH). In France: The substances on the Candidate List are included in the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS. LOQ: 100 mg/kg

Ethylenethiourea



Required limit value:	Should not be present in products.
CAS RN:	Imidazolidine-2-thione (2-imidazoline-2-thiol) also called ethylenethiourea: 96-45-7
Properties:	Toxic for reproduction.
Use:	Used primarily as an accelerator for vulcanizing rubber
Legal background:	Ethylenethiourea is listed on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: LC-MS LOQ: 20 mg/kg

Ethylenediamine (EDA)



Required limit value:	Should not be present in products.
CAS RN:	107-15-3
Properties:	Allergenic (respiratory and skin sensitizer).
Use:	Used in the production of many industrial chemicals. Used as a catalyst in epoxy resins (in glues, adhesives, paints). Used in the production of polyurethane.
Legal background:	Ethylenediamine is listed on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: LC-MS, GC-MS LOQ: 100 mg/kg

Formaldehyde



Required limit value: 1000 mg/kg
CAS RN: 50-00-0

Properties: Formaldehyde is a volatile colourless gas that is CMR classified. Occurs naturally in small quantities in the atmosphere and in nature. Formaldehyde is a human carcinogen that can also cause skin irritation and allergy.

Use: Transformation product from formaldehyde releasers such as carbamide- and melamine binders (glues). Preservative.

Comments: Use products without formaldehyde or with very low concentrations of formaldehyde. Due to its volatility, formaldehyde is “contagious”.

Legal background: Formaldehyde and formaldehyde-releasing substances are restricted in furniture and wood-based articles (max release 0,062 mg/m³) as well as other articles (max release 0,080 mg/m³), according to Annex XVII of Regulation (EC) No 1907/2006 (REACH), entry 77.

Releases of formaldehyde from construction products are also restricted.

German law (Bedarfsgegenständeverordnung and Chemikalien-Verbotsverordnung); Products with formaldehyde content shall be labeled. Wooden products shall not release formaldehyde. Cleaning and finishing agents shall not contain formaldehyde above 0.2%.

Test method: EN 717-1, -2, -3 (emissions)
EN 120 (content)
ISO/DIS 12460-2, -3, 4 (emissions)
EN ISO 141 84-1(textiles), LOQ: 16 mg/kg
ISO 17226 (leather), LOQ: 16 mg/kg

Formamide



Required limit value:	Should not be present in products.
CAS RN:	75-12-7
Properties:	Toxic for reproduction.
Use:	Formamide is used as solvent for example in the production of synthetic leather and inks. Furthermore, formamide is used as a solvent and plasticizer in consumer products. It can be an ingredient as softener for paper, water soluble glues and wood stains. During processing of foam, formamide is formed as a by-product at higher temperatures. Especially tosylsemicarbazide and azodicarbonamide (see headline ADCA above) are responsible for the presence of formamide in EVA-consumer products.
Comments:	Potential alternatives as N,N-dimethylformamide, N-methylformamide or low molecular weight ethylene glycol ethers are not considered to be adequate substitutes due their similar toxicity to reproduction.
Legal background:	Formamide is listed on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105). Formamide is restricted in puzzle mats in Belgium and France and included in the Toy Safety Directive (limit value 200 mg/kg).
Test method:	No standardised test method available. Solvent extraction. Test equipment: GC-MS or LC-MS LOQ: 50 mg/kg

Fluorinated Greenhouse gases

(Perfluorocarbons (PFCs), Sulfur hexafluoride (SF₆) and Hydrofluorocarbons (HFCs))



Required limit value:	Should not be used in processes or present in products.
CAS RN:	Several, see appendix 5.
Properties:	Dangerous for the environment.
Use:	Semiconductor manufacturing processes use high GWP fluorinated compounds including perfluorocarbons (e.g., CF ₄ , C ₂ F ₆ and C ₃ F ₈), hydrofluorocarbons (CHF ₃ , CH ₃ F and CH ₂ F ₂), nitrogen trifluoride (NF ₃) and sulfur hexafluoride (SF ₆). Refrigerant, foaming agent, extinguishing agents, cleaning agents, insulating media, caustic gas. SF ₆ plasma is used in the semiconductor industry as an etchant and for flat panel display units manufacturing.
Alternative:	Ammonia, hydrocarbons, carbondioxide, depending on specific use/application.
Legal limit:	Intentionally added. Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases
Test method:	No suited method for dissolved gases in products

Hexahydrophthalic anhydrides (HHPA and MHHPA)



Required limit value:	Should not be present in products.
CAS RN:	Hexahydromethylphthalic anhydride; 25550-51-0 Hexahydro-4-methylphthalic anhydride; 19438-60-9 Hexahydro-1-methylphthalic anhydride; 48122-14-1 Hexahydro-3-methylphthalic anhydride; 57110-29-9 Hexahydrophthalic anhydride; 85-42-7, 14166-21-3, 13149-00-3
Properties:	Allergenic (skin and respiratory sensitizer). Impacts caused by MHHPA on the health of the affected individuals and on society as a whole, are comparable to those elicited by category 1 carcinogens, mutagens and reproductive toxicants (CMRs), and the substance is considered of very high concern.
Use:	MHHPA is a curing agent for epoxy resin mainly used in electric and electronics field. MHHPA is commonly used in a specific mixture with HHPA (hexahydrophthalic anhydride). Found in diode (LED), transmitter and capacitor in electronic manufacturing industry.
Legal background:	0.1% by weight Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS

Hydrazine



Required limit value: Should not be used in processes or present in products.

CAS RN: Hydrazine: 302-01-2, 7803-57-8

Properties: Carcinogenic, allergenic (skin sensitizer), toxic.

Use: Mainly used as a chemical foaming agent in preparing polymer foams. Corrosion inhibitor.

Comments: Use physical blowing agents such as carbondioxide, hydrocarbons or nitrogen as alternative to chemical blowing agents when possible.

Legal background: 0.1% by weight
Candidate list (REACH).

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

Test method: No standardised test method available.

Test equipment: UV-VIS Spectrometer, GC-MS
LOQ: 200 mg/kg

Imidazoles



Required limit value:	Should not be used in processes or present in products.
CAS RN:	1-vinylimidazole CAS 1072-63-5 2-methylimidazole CAS 693-98-1
Properties:	Toxic for reproduction
Use:	Mainly used in formulations and as a monomer in the production of polymers As a catalyst in the production of coating products. It can be used as the curing agent of adhesives, epoxy resin and as additives for the preparation of foam plastics
Legal background:	1-vinylimidazole and 2-methylimidazole are included in the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS. LOQ: 200 mg/kg

4,4' - Diaminodiphenylmethane (MDA)



Required limit value: Should not be used in processes or present in products.

CAS RN: 101-77-9

Properties: Carcinogenic, persistent.

Use: Hardener for epoxy resins, intermediate in the manufacture of high performance polymers e.g. building block for polyether ether ketone (PEEK). Mainly used in epoxy coatings and composites and PEEK. MDA is reacted in the polymerisation process and likely not found free in the material.

Legal background: 0.1% by weight
MDA is included on the Candidate list (REACH).

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

Test method: No standardised test method available.
Test equipment: LC-MS, GC-MS.

2,2'-dichloro-4,4'-methylenedianiline (MOCA)



Required limit value:	Should not be used in processes or present in products.
CAS RN:	101-14-4
Properties:	Carcinogenic, persistent.
Use:	<p>Curing agent (for polyurethane resins, epoxy resins and epoxy urethane resins, polystyrene and poly(methylmethacrylate) (PMMA), cross-linker (for polyurethane), chain extender (for polyurethane) or prepolymer, MOCA may be used as a curing agent in cast polyurethane elastomer production. Polyurethanes with crosslinking agent can be used in the production of machines, buildings, automobiles, airplanes, mining and sport equipment. The amount of un-reacted MOCA is estimated to be in the range of 0.01% and 4%</p>
Legal background:	<p>0.1% by weight MOCA is included on the Candidate list (REACH).</p> <p>In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).</p>
Test method:	<p>No standardised test method available. Test equipment: LC-MS, GC-MS.</p>

Michler's ketone



Required limit value:	Should not be used in processes or present in products.
CAS RN:	Michler's ketone (4,4'-bis(dimethylamino)benzophenone): 90-94-8.
Properties:	Carcinogenic.
Use:	Process chemical in the production of electronic circuit boards
Legal background:	0.1w% Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: LC-MS

Melamine



Required limit value:	Should not be present in products.
CAS RN:	108-78-1
Properties:	Persistent and mobile in environment, Toxic, Carcinogenic
Use:	Used to make melamine derivatives and melamine polymers. Melamine formaldehyde resins/polymers for plastic parts, e.g. switch, relay, plug, socket, plug outlet connector. Melamine resins also for coatings, e.g. enamel type coatings. Melamine formaldehyde foams for electric heat insulation. Melamine derivatives are used as nitrogenous flame retardants, e.g. for epoxy.
Legal background:	Included in the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	GC-MS, LC-MS

Ozone depleting substances



Required limit value:	Should not be used in processes or present in products.
Properties:	Liquid or gas. Dangerous for the environment.
Use:	Refrigerant, foaming agent, extinguish ant, solvent cleaner.
Comments:	Alternatives: water-based cleaning in processes, carbon dioxide/water blowing as foaming agent. Several alternatives are greenhouse gases (HFC).
Legal limit:	Intentionally added. Montreal protocol, Regulation (EU)2024/590 on substances that deplete the ozone-layer and Regulation (EU) No 2024/573 on fluorinated greenhouse gases.
Test method:	No suited method for dissolved gases in products

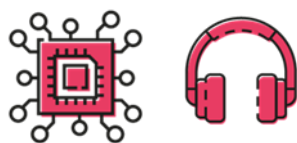
PAH - Polycyclic aromatic hydrocarbons



Required limit value:	Should not be used in processes or present in products.
CAS RN:	Various, regulated PAHs are listed in appendix 6.
Properties:	Carcinogenic, allergenic (sensitizer), toxic. Several are persistent, bioaccumulative and toxic in the environment.
Use:	<p>PAHs are not synthesized chemically for industrial purposes. The major source of PAHs is the incomplete combustion of organic material such as coal, oil and wood. They are used as intermediaries in pharmaceuticals, agricultural products, photographic products, thermosetting plastics, lubricating materials, and other chemical industries.</p> <p>May be found as impurities in rubber materials, soft plastics, colored plastics containing carbon black and leather</p>
Comments:	Avoid critical sources for PAH such as Carbon Black and contaminated mineral oil-based lubricants (extender oil) in rubber.
Legal background:	<p>Eight PAHs are listed in annex XVII, entry 50 of the Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH). Materials in toys or childcare articles that come into direct contact with the human skin shall not include of any of the listed PAHs in amounts more than 0.5 mg/kg.</p> <p>For rubber or plastic materials with skin contact in other product categories the limit value is 1 mg/kg</p> <p>The voluntary German GS standard has requirements for the sum of 15 PAH and also specifically benzo [a] pyrene that most products in the German market follow. See appendix 6.</p> <p>Several PAHs are included in the Candidate list (REACH).</p> <p>In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).</p>

Test method: ISO 21461 (NMR)
AfPS GS 2019-01 PAK
IEC 62321-10:2020
LOQ: 0.2 mg/kg

Photo-initiators



Required limit value:	Should not be present in products.
CAS RN:	Diphenyl(2,4,6-trimethylbenzoyl)phosphine oxide (TPO): 75980-60-8 2-(dimethylamino)-2-[(4-methylphenyl) methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one, Irgacure 379: 119344-86-4 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone Irgacure 369: 119313-12-1 2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one, Irganox 907: 71868-10-5
Properties:	Toxic for reproduction. Very toxic to aquatic life with long lasting effects
Use:	Photo-initiators are used in a variety of products, including printing inks, UV coatings, and optical fiber coatings. Commonly used in electronics, printed circuit board manufacturing.
Comments:	The main emission and exposure can be expected at industrial workplaces. May be present in the cured ink/print in concentration above 0.1%, but information may not apply in the final article.
Legal background:	TPO, Irganox 907, Irgacure 369 and Irgacure 379 are included on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. GC-MS

PFAS - Highly fluorinated sulphonic acids (PFOS and related substances)



Required limit value:	Should not be present in products.
CAS RN:	Several, including 1763-23-1, 355-46-4
Properties:	Highly fluorinated carboxylic acids (PFSA) such as PFOS are persistent, bioaccumulative and toxic (PBT) substances. PFOS can cause cancer (testicular and kidney cancer), liver damage and changes in immune- and endocrine system (e.g. cholesterol levels).
Use:	Antistatic agent for films and plastics. Surface treatment surfactant in semiconductor industry. Protective surfactant layer for metal plating with Cr (VI) compounds. PFOS and other PFSA are used as an emulsifier in the production of fluoropolymers such as polytetrafluoroethylene (PTFE) etc. They can be as present as pure substances in products or as precursor chemicals (e.g. polymers) that form PFOS and other PFSA due to transformation processes. Salts of PFBS are used as additives in plastics for anti-static properties, as flame retardants (in PC) and in manufacturing processes of plastics (e.g. for compounding).
Legal limit:	<p>Legal limit: Shall not occur</p> <p>PFOS and its derivatives are listed as POPs in the Stockholm Convention on Persistent Organic Pollutants (POPs) and banned in EU by the POPs Regulation (EU) No 2019/1021. Residues below 0.1% by weight in articles or part of articles are allowed to be placed on the market and used, as these are the amounts that may be present as impurities:</p> <p>PFHxS (perfluorohexane-1-sulphonic acid) and its salts and related substances are listed in the Stockholm Convention on Persistent Organic Pollutants (POPs) and banned in EU by the POPs Regulation (EU) No 2019/1021. Residues below 0.025 mg/kg by weight of each substance, and 1 mg/kg of a combination of PFHxS-related substances in substances, mixtures, and articles are allowed to be placed on the market and used, as these are amounts that may be present as impurities.</p>

Perfluorohexane-1-sulphonic acid and its salts (PFHxS), and Perfluorobutane sulphonic acid (PFBS) and its salts are listed on the Candidate List (REACH).

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

Declaration duty in Sweden to the Swedish Chemicals Agency for PFAS deliberately added in chemical products that are.

Test method:

CEN/TS 15968:2010

IEC 62321-3-2 (Screening – Fluorine by combustion-ion chromatography (C-IC)

EN 14582 (total fluorine)

Test equipment: LC-MS

PFAS - Various substances



Required limit value:	Should not be present in products.
CAS RN:	13252-13-6
Properties:	Highly fluorinated ethers (PFPEs) such as HFPO-DA (2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid) were developed as replacements for PFOA and PFOS. They are water-soluble and mobile surfactants that are under suspicion to be equally persistent as other PFASs. While the bioaccumulation potential of HFPO-DA is still uncertain, this substance has showed adverse effects on kidney, immune- and haematological system, as well as effects on foetus development in animal studies. Other PFPEs are likely to be equally stable and mobile.
Use:	PFPEs are used as emulsifiers in the production of fluoropolymers such as polytetrafluoroethylene (PTFE) etc.
Comments:	Non-fluorinated emulsifiers such as hydrocarbons should be preferred to produce fluoro polymers. Fluorinated emulsifiers may only be applied for essential uses.
Legal background:	<p>HFPO-DA, its salts and its acyl halides (CAS 13252-13-6, 67118-55-2, 2062-98-8 and 62037-80-3) are listed on the Candidate List (REACH).</p> <p>In France: The substances on the Candidate List are included under the AGECL legislation (LOI n° 2020-105).</p> <p>Declaration duty in Sweden to the Swedish Chemicals Agency for PFAS deliberately added in chemical products .</p>
Test method:	<p>IEC 62321-3-2 (Screening – Fluorine by combustion-ion chromatography (C-IC)) EN 14582 (total fluorine) Test equipment: LC-MS LOQ: -</p>

Solvents – Aromatic organic solvents



Required limit value:	Should not be present in products.
CAS RN:	Various
Properties:	Liquids or gases. Inhalation can affect the nervous system and cause headache, fatigue and nausea. Cause irritation on skin, eyes and mucous membranes. Kerosene and diesel odour in finished products. Some aromatic organic compounds are carcinogenic.
Use:	Solvents.
Comments:	Many but not all aromatic organic solvents are volatile organic compounds (VOC). There are statutory hygienic limit values for employees in many countries. Alternatives are solvents of higher quality with lower levels of aromatic hydrocarbons or synthetic thickeners based on polycarboxylic acids. To avoid problems with organic solvents, switching to water-based dyeing and printing processes is recommended.
Legal background:	Manufacturers in the EU are required to follow the Industry Emissions Directive (IED), (EU) 2024/1785. France regulates certain mineral oils in ink for packaging and printed paper (the AGECE legislation, LOI n° 2020-105). Limits: 1.0% for Aromatic hydrocarbons (MOAH) consisting of 1 to 7 aromatic rings by January 2023; 0.1% for MOAH consisting of 1 to 7 aromatic rings by January 2025 and 1 ppm MOAH compounds containing 3 to 7 aromatic rings by January 2025.
Test method:	SNV 195 651, screening method. Panel odour test. Detection limit: No odour. No standardised quantitative test method for materials available.

Solvents – Aliphatic organic solvents



Required limit value:	Should not be present in products.
CAS RN:	Various
Properties:	Liquids or gases. Inhalation can affect the nervous system and cause headache, fatigue and nausea, as well as chronic effects. Cause irritation on skin, eyes and mucous membranes.
Use:	Solvents. The limit for humans to sense a smell lies around 100 mg/kg for most substances.
Comments:	Some aliphatic organic solvents are volatile organic compounds (VOC). If possible, chose water-based systems based on easily degradable surfactants. If not possible to switch over to water- based systems, there are statutory hygienic limit values for employees in many countries for strict compliance to maintain workers safety.
Legal background:	<p>Manufacturers in EU are required to follow the “IED”, (EU) 2024/1785.</p> <p>2-methoxyethyl acetate, CAS RN 110-49-6, and formamide, CAS RN 75-12-7 , are two aliphatic solvents listed on the Candidate List (REACH).</p> <p>In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105). The legislation also regulates certain mineral oil in ink for packaging and printed paper. Limit: 0.1% for mineral oil saturated hydrocarbons (MOSH) consisting of 16 to 35 carbon atoms by January 2025.</p>
Test method:	SNV 195 651, screening method. Panel odour test. Detection limit: No odour.

Solvents - DMFa (N, N-dimethylformamide)



Required limit value:	Should not be present in products in concentrations above 500 mg/kg (sum of DMFa, DMAC and NMP)..
CAS RN:	N,N-dimethylformamide (DMFa): 68-12-2
Properties:	Toxic to reproduction. It may have a faint amine odour in finished products.
Use:	Used as solvent and in high voltage capacitors. Used in production of elastomers, leather imitation, as PU, acrylic and aramide. An intermediate for paper finishing
Comments:	If possible, chose water-based systems based on easily degradable. surfactants. If not possible to switch over to water-based systems, there are statutory hygienic limit values for employees in many countries for strict compliance to maintain workers safety.
Legal background:	Candidate list (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	Test equipment: GC-MS EN 16778 (protective gloves) CEN ISO/TS 16189 (footwear and footwear components) EN 17131 (textile) LOQ: 10 mg/kg

Solvents – DMAC



Required limit value:	Should not be present in products in concentrations above 500 mg/kg (sum of DMFa, DMAC and NMP)..
CAS RN:	N, N-dimethylacetamide (DMAC): 127-19-5
Properties:	Toxic to reproduction, irritating.
Use:	Used in electrolytic capacitors, as solvent and in industrial coatings, elastomers, polyimide films, paint strippers and ink removers. Residues may remain in products as unreacted process chemical.
Comments:	If not possible to switch over to water-based systems, there are statutory hygienic limit values for employees in many countries for strict compliance to maintain workers safety.
Legal background:	Candidate list (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised quantitative test method for electronics available. Test equipment: GC-MS, LC-MS EN 17131 (textile) LOQ: 10 mg/kg.

Solvents – Pyrrolidones (NMP, NEP)



Required limit value:	Should not be present in products in concentrations above 500 mg/kg (sum of DMFa, DMAC and NMP).
CAS RN:	N-methyl-2-pyrrolidone (NMP): 872-50-4 1-ethylpyrrolidin-2-one (NEP): 2687-91-4
Properties:	Toxic to reproduction, irritating.
Use:	<p>Good solvency properties for polymers. Surface treatment of resins and metal coated plastics or as a paint stripper. Intermediates for plasticizers, stabilizers and specialty inks. It is also used in lithium ion battery fabrication, as a solvent for electrode preparation. Used as solvent in textile coating processes and in production of leather imitation (PU).</p> <p>Polyamide precursor. SBR (styrene-butadiene) latex production.</p>
Comments:	If not possible to switch over to water-based systems, there are statutory hygienic limit values for employees in many countries for strict compliance to maintain workers safety.
Legal background:	<p>Candidate list (REACH).</p> <p>NMP and NEP have limit values for working environment under Annex XVII of Regulation (EC) No 1907/2006 (REACH), entry 71</p> <p>In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).</p>
Test method:	<p>No standardised test method for electronics available.</p> <p>Test equipment: GC-MS, LC-MS EN ISO 19070 (leather) prEN 17131 (textile) LOQ: 25 mg/kg.</p>

Solvents – Chlorinated organic solvents



Required limit value: Should not be used in processes or present in products.

CAS RN: Various

Properties: Liquid or gas. Affect the nervous system. Irritating to skin and mucous membranes. Many chlorinated organic solvents are dangerous for the environment.

Use: Solvent used in the manufacture of rubber, metal paint and several industries used for grease and oil, e.g. in stain removers. Also used in cleaning agents and detergents. See also under heading “Flame retardants”.

Comments: Where possible, apply water-based emulsions based on easily degradable surfactants. Alternative products are available or under development for all uses.

Legal background:

Solvent	CAS-RN	Legal framework	Legal requirement
Chloroform	67-66-3	Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH). Entry 32, 36, 37, 38, 64	Shall not be placed on the market, or used as substances, as constituents of other substances or in mixtures in concentrations equal to or greater than 0.1% by weight
1,1,2 Trichloroethane	79-00-5		
1,1,2,2 Tetrachloroethane	79-34-5		
1,1,1,2 Tetrachloroethane	630-20-6		
Pentachloroethane	76-01-7		
1,1 Dichloroethylene	75-35-4		
1,4-dichlorobenzene	106-46-7		
Carbon tetrachloride	56-23-5	Regulation (EC) No 1005/2009 of the European Parliament and of the Council of 29 June 2000 on substances that deplete	Shall not be produced, placed on the market, or used
1,1,1 Trichloroethane	71-55-6		

		the ozone layer	
$\alpha,\alpha,\alpha,4$ -tetrachlorotoluene; p-chlorobenzotrichloride	5216-25-1	Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH). Entry 72	1 mg/kg in textiles
α,α,α -trichlorotoluene; benzotrichloride	98-07-7		
α -chlorotoluene; benzyl chloride	100-44-7		
Trichloroethylene	79-01-6	Included in Authorization List and in candidate List of Substances of Very High Concern for authorization and annex XIV in Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH)	Authorisation is needed for use in EU 0.1% by weight in articles for information duty.
1,2,3-trichloropropane	96-18-4	Candidate List of Substances of Very High Concern for authorization in Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH)	0.1% by weight in articles for information duty.

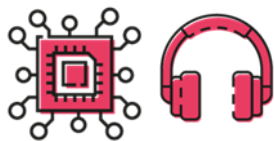
Manufacturers in EU are required to follow the the Industry Emissions Directive (IED), (EU) 2024/1785.

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Test method:

No standardised test method available.
Test equipment: GC-MS, GC-ECD.
LOQ: 0.5 mg/kg (GC-MS)

TGIC and β -TGIC



Required limit value:	Should not be present in products.
CAS RN:	1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione (TGIC): 2451-62-9 1,3,5-tris[(2S and 2R)-2,3-epoxypropyl]-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione (β -TGIC): 59653-74-6
Properties:	Mutagen toxic
Use:	Mainly used as a hardener in resins and coatings; also used in inks for the printed circuit board industry, electrical insulation material, resin moulding systems, laminated sheeting, silk screen printing coatings, tools, adhesives, lining materials and stabilisers for plastics.
Legal background:	Legal Limit: 0.1% by weight The Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: LC-MS

Tin organic compounds (Organostannic compounds)



Required limit value:	Should not be present in products.
CAS RN:	Various
Properties:	Tributyltin, dibutyltin and dioctyltin compounds are different chemical substances that are toxic and dangerous for the environment. Bioaccumulative and persistent.
Use:	Dibutyltin compounds (DBT) and dioctyltin compounds (DOT) are used in consumer products as heat stabilizers (mainly PVC) or catalysts, Lewis acid catalysts (PU and PVC). Organotin catalysts are used in a wide variety of polyurethane applications, aiding formation of the urethane bond and generally functioning as Lewis acid catalysts. Dibutyltin dichloride (DBTC) may be used as additive in the production of rubber tires.
Comments:	<p>Alternative stabilizers are barium/zinc, potassium/zinc, calcium or calcium/zinc organic stabilisers.</p> <p>Alternative catalysts can be organotitanate or zirconate compounds (e.g. titanium 2-ethylhexanoate) or amines such as bis- (dimethylaminoethyl) ether (BDMAEE) and triethylenediamine (TEDA) along with organometallic compounds such as potassium acetate.</p> <p>Dialkyl tin compounds represents a large family of substances that consist of the following common constituents, see list of DBTs in appendix 2.</p> <p>Trialkyltin compounds are biocides, see also the section regarding Biocidal agent.</p>
Legal background:	<p>Legal Limit: 0.1% by weight</p> <p>Dioctyltin (DOT), dibutyltin (DBT) compounds and tri-substituted organostannic compounds such as tributyltin (TBT) shall not be used in articles. Annex XVII of the Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 20. Several TBT compounds (pesticides) are also included in the Rotterdam convention.</p> <p>Tributyltin oxide (TBTO), 56-35-9, Dibutyltin dichloride (DBTC), 683-18-1, 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-</p>

oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE), 15571-58-1 and reaction mass of DOTE and MOTE, Dibutylbis(pentane-2,4-dionato-O,O')tin, 22673-19-4 and Dioctyltin dilaurate, are listed on the Candidate List (REACH).

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

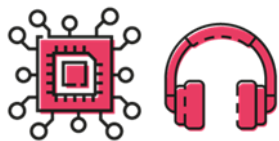
Test method:

No standardised test method.

Test equipment: GC-MS.

LOQ: 0.2 mg/kg

Trimellitic anhydride (TMA)



Required limit value:	Should not be present in products.
CAS RN	552-30-7
Properties:	May cause allergy or asthma symptoms. May cause an allergic skin reaction.
Use:	Trimellitic anhydride is used mainly in the synthesis of trimellitate esters. These esters are used as plasticizers for polyvinyl chloride, especially when temperature stability is required. TMA is also used for producing epoxy and alkyd resins as well as a variety of other products including dyes, insecticides, polyester resins and pharmaceuticals. It is also widely used in the formulation of paints and plastics.
Comments:	Alternative plasticizers may be epoxidized soybean oil (ESBO)
Legal background:	TMA is listed on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method

PRODUCT-RELATED (END-USE) CHEMICALS

Arsenic compounds



Required limit value:	Should not be present in products.
CAS RN:	Various
Properties:	May cause cancer. Toxic by inhalation and toxic if swallowed. Persistent, bioaccumulative and toxic.
Use:	Fining agent in glass, in semiconductors, pigment in metal alloy, preservative in wood.
Comments:	Triethyl arsenate may potentially be used in the fabrication of integrated circuits. Arsenic acid is used in the fabrication of printed circuit boards. Arsenic may be used in glass and ceramics.
Legal limit:	0.1% by weight Diarsenic Pentoxide; 1303-28-2 Diarsenic Trioxide; 1327-53-3 Triethyl arsenate; 15606-95-8 Arsenic acid; 7778-39-4 Calcium arsenate; 7778-44-1 are listed both on the Candidate List (REACH) As wood preservatives regulated in Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 19 (limit level; no intentionally added content) In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	ISO 19050 (rubber) No standardised test method available. Test equipment: AAS, ICP-MS and ICP-OES LOQ: 100 µg/kg

Asbestos

Required limit value:	Should not be present in products
CAS RN:	Asbestos;1332-21-4
Properties:	May cause cancer.
Use:	Brake lining pad, insulator, filler, abrasive, pigment, paint, talc, adiabatic material. Chrysotile and tremolite are common contaminants in talc.
Comments:	Asbestos is the generic name for a group of six naturally occurring fibrous silicate minerals: Actinolite; 77536-66-4 Amosite ; 12172-73-5 Anthopyhyllite ; 77536-67-5 Chrysolite ; 12001-29-5 Crocidolite ; 12001-28-4 Tremolite ; 77536-68-6
Legal limit:	Intentionally added Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 6. Legal exposure limit 0,1 fibre/cc (cubic centimetre) The six fibrous silicate minerals Asbestos are listed in the Rotterdam convention
Test method:	No standardised test method available. Test equipment: Microscopic examination (industry practice; ratio of fibre length to diameter is at polarized light filter least 3:1).

Bis(4-chlorophenyl) sulfone (BCPS)



Required limit value:	Should not be present in products.
CAS RN:	Bis(4-chlorophenyl) sulfone (BCPS): 80-07-9
Properties:	Very persistent and very bioaccumulative (vPvB). Under assessment for PBT. High aquatic toxicity.
Use:	Demanding electronic components in medical equipment microwave ovens and machined parts. Monomer to produce higher-temperature and higher-performance polymers (e.g. aromatic polysulfones). These materials have high resistance to burning and in most applications no flame-retardant additives are needed. Due to good electrical insulation properties and a high resistance to hydrolysis BCPS based polymers are used in wide range of applications.
Comments:	May be present as production impurities. The main emission and exposure can be expected at industrial workplaces.
Legal background:	BCPS is included on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method	No standardised test method available

Cadmium (Cd) and cadmium salts



Required limit value:	Should not be present in products.
CAS RN:	Cadmium (metal): 7440-43-9
Properties:	Heavy metal that occurs naturally in small quantities in nature. Toxic to aquatic organisms. Non-biodegradable. Dangerous for the environment. Can cause kidney damage.
Use:	Surface treatment of products-electroplating, relay contact, photodiode voltaic cell. Pigment in colouring agent. Also in plastics (PVC) as stabilizers and pigment. Cadmium based stabilizers to increase the service of life of the material. In Ni/Cd batteries. For recycled packaging cadmium may have had a different original use.
Comments:	Calcium-zinc based stabilizers. Order cadmium-free processes and materials. Battery alternatives are available, such as nickel-zinc (NiZn), nickel metal hydride (NiMH) and lithium-ion (Li-ion) batteries. Occurrence in materials below 0.5 mg/kg is generally regarded as contaminations which cannot be controlled.
Legal limit:	100 ppm in homogenous material ¹ Directive 2011/65/EC of the European Parliament and of the Council (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment Legal limit in batteries: 0.002 weight% in portable batteries (expressed as cadmium metal). Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries.

¹ The RoHS substance restrictions apply to every individual homogenous material in the part. Exemptions are given in Appendix 1

0.01 % by weight (100 ppm) in articles produced from plastic material and in the paint of painted articles. Cadmium shall not be used in brazing fillers or in jewellery.

Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 23

Cadmium, Cadmium oxide (1306-19-0), Cadmium sulphide (1306-23-6), Cadmium chloride (10108-64-2), Cadmium fluoride (7790-79-6) Cadmium sulphate (10124-36-4, 31119-53-6) , Cadmium nitrate (10325-94-7), Cadmium carbonate (513-78-0) and Cadmium hydroxide (21041-95-2) are listed on the Candidate List (REACH).

The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed 100 mg/kg Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

Cadmium is restricted in Denmark. Danish legal limits: 75 mg/kg. (*Bekendgørelse nr. 858 af 5. September 2009 om forbud mod import salg og fremstilling af cadmiumholdige varer*)

Test method:

IEC 62321-3-1 (screening Cd)

IEC 62321-5

ISO 19050 (rubber) Test equipment: 1) XRF. 2) AAS, ICP-MS and ICP-OES

LOQ: 1) 50 mg/kg. 2) 100 µg/kg.

Chromium VI compounds



Required limit value:	Should not be present in products.
CAS RN:	Several Chromium VI substances. Chromium VI (Cr+6, hexavalent chromium): 18540-29-9 Chromium (VI) oxide: 1333-82-0
Properties:	Dangerous for the environment. Carcinogenic. Allergenic (sensitizer). Toxic.
Use:	Chromium trioxide (1333-82-0) is used for the passivation of copper foils in the manufacture of printed circuit board. Surface treatment (anti corrosive) in steel manufacturing. Chromic acid is used as wood preservative. Some dyes and pigments may contain chromium.
Comments:	Chromium (III), silane-based coating and organic resins may be alternatives for PWB copper passivation but must be evaluated. Chrome (III) is an alternative in surface treatment of metal but only for decorative metal plating and not hard metal plating. Other metals such as tin and zinc may be used for metal plating instead of chromium (VI).
Legal limit:	1000 ppm in homogenous material ² Directive 2011/65/EC of the European Parliament and of the Council (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment 0,0003% by weight (3 mg/kg) for leather in direct skin contact 0.1% by weight for other applications Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 47. Chromium (VI) compounds listed on the Candidate list (REACH) are listed in Appendix 3.

² The RoHS substance restrictions apply to every individual homogenous material in the part. Exemptions are given in Appendix 1

Several Chromium compounds are also included in REACH Annex XIV.

The sum of concentration levels of Lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed 100 mg/kg Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Test method:

IEC 62321-3-1 (screening total Cr)

IEC 62321-5 (Cr)

IEC 62321-7-1, -2 (CrVI)

ISO 19050 (rubber)

Cobalt and cobalt (II) compounds



Required limit value:	Cobalt (II) should not be present in products.
CAS RN:	Various
Properties:	Carcinogenic and toxic for reproduction. Conflict mineral. A large part of the world's cobalt production derives from mines in the Democratic Republic of the Congo (DRC).
Use:	Cobalt (II) compounds are used as surface treatment (anti corrosive) in steel manufacturing. Cobalt dichloride is used in drying agent, desiccant (silica gel), as humidity indicator. Cobalt is a key component of lithium batteries.
Comments:	There are alternative systems based on Cerium, Chrome (III), Titan, Zirconium, Silica etc. depending on metal surface treated. Assure and promote ethical and responsible sourcing of cobalt.
Legal limit:	0.1% by weight Cobalt dichloride: 7646-79-9 Cobalt(II) carbonate: 513-79-1 Cobalt(II) diacetate: 71-48-7 Cobalt(II) dinitrate: 10141-05-6 Cobalt(II) sulphate: 10124-43-3 are listed on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	IEC 62321 ISO 19050 (rubber) Test equipment: 1) XRF. 2) AAS. 3) ICP-MS and ICP-OES LOQ: 1) 50 mg/kg as Cobalt. 2) 100 µg/kg as Cobalt.

EGDME, DEGDME and TEGDME



Required limit value: Should not be used in processes or present in products.

CAS RN: 1,2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME); 110-71-41,2-Diethoxyethane; 629-14-1
Bis(2-methoxyethyl) ether (diglyme,); 111-96-6
1,2-bis(2-methoxyethoxy)ethane (triglyme, TEGDME); 112-49-2
Bis(2-(2-methoxyethoxy)ethyl)ether (tetraglyme, TEGDME); 143-24-8

Properties: Toxic for reproduction

Use: Use as an electrolyte solvent in lithium batteries. As a solvent or as a processing aid in the manufacture and formulation of industrial chemicals. May be in found in printing inks.

Legal limit: 0.1% by weight
The Candidate list (REACH)

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Test method: No standardised test method available.
Test equipment: LC-MS

Flame retardants/Biocides - Boric acid, and related boron compounds



Required limit value:	Should not be present in products.
CAS RN:	Boric acid; 10043-35-3 and 11113-50-1 Disodium tetraborate anhydrous; 1303-96-4, 12179-04-3 and 1330-43-4 Tetraboron disodium heptaoxid, hydrate; 12267-73-1 Diboron trioxide; 1303-86-2 Lead bis(tetrafluoroborate) 13814-96-5 Sodium perborate; perboric acid, sodium salt, 234-390-0 Sodium peroxometaborate, 7632-04-04 Disodium octaborate, 12008-41-2 Orthoboric acid, sodium salt, e.g. 13840-56-77 Barium diboron tetraoxide, 13701-59-2
Properties:	Toxic to reproduction
Use:	Diboron trioxide, and Boron sodium oxide (B ₃ NaO ₅) may be found in electrical components of glass and ceramic (resistors, condensers, diodes). Wood veneers/pressed wooden panels. Boric acid and other boron compounds may be used as flame retardant in wood, for polystyrene beads and biocidal agent in boards etc.
Legal limit:	Boric acid, disodium tetraborate anhydrous, disodium octaborate, tetraboron disodium heptaoxid, hydrate, diboron trioxide, lead bis(tetrafluoroborate), sodium perborate; perboric acid, sodium salt, Sodium peroxometaborate and Orthoboric acid, sodium salt are listed on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: AAS, ICP-MS and ICP-OES LOQ: 25 mg/kg for individual compounds (10 mg/kg for total Boron content)

Flame retardants - Chloroorganic phosphates (TCEP, TCPP, TDCPP/TDCP)



Required limit value:	Should not be present in products.
CAS RN:	Tris(2-chlorethyl)phosphate (TCEP): 115-96-8 Tris(2-chloro-1-methylethyl) phosphate (TCPP; CAS 13674-84-5) Tris(1,3-dichloro-2-propyl)phosphate (TDCPP/TDCP; CAS 13674-87-8)
Properties:	Persistent, bioaccumulative and toxic. Halogenated organic additives in polymers may leach out and have a negative impact on health and environment. Halogen containing polymers may form highly corrosive substances and undefined range of halogenated substances that may be PBT or CMR when incinerated.
Use:	Flame-retardant treatment of products. Plasticizers.
Comments:	Replace chloroorganic chemical flame retardants with phosphorus- and/or nitrogen-based organic chemical flame retardants or non chemical barrier technologies.
Legal background:	Legal limit: 0.1% by weight Tris(2-chlorethyl) phosphate (TCEP) is listed in the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	EC 62321-11 . Test equipment: GC-MS, LC-MS, GC-ECD LOQ: 5 mg/kg.

Flame retardants/Plasticizers - Chloroparaffins



Required limit value:	Should not be present in products.
CAS RN:	Short-chain chloroparaffins (SCCP; C10-C13): e.g. 85535-84-8 Medium-chain chloroparaffins (MCCP; C14-C17): e.g. 85535-85-9, 198840-65-2, 1372804-76-6 Long-chain chloroparaffins (LCCP; C18-): e.g. 85535-86-0
Properties:	Persistent, bioaccumulative and toxic. Carcinogenic. Allergenic (sensitizer).
Use:	Plasticizers and flame retardant in plastic material and rubber. Fat liquoring agent in leather production.
Comments:	Alternative plasticizers and flame retardants are available but must be evaluated. Halogen-free alternatives include phosphorus- and nitrogen-based flame retardants and non-chemical barrier technologies.
Legal background:	Legal limit: Shall not occur. Short-chain and medium-chain chloroparaffins are listed as POP in the Stockholm Convention on Persistent Organic Pollutants (POPs). SCCPis banned (legal limit 0.15%) in EU by Regulation (EU) No 2019/1021. Short-chain chloroparaffins (C10-C13) and Medium-chain chloroparaffins (C14-C17) are listed on the Candidate list (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS, LC-MS

Flame retardants - Dechlorane™ Plus



Required limit value:	Should not be present in products
CAS RN:	13560-89-9; 135821-74-8; 135821-03-3 (Dodecachloropentacyclo octadeca diene)
Properties:	Persistent and bioaccumulative.
Use:	Flame retardant for plastics, electronic wiring and cables, automobiles, hard plastic connectors and plastic roofing material. Use in adhesives and sealants. Use in binding agents.
Legal background:	<p>Dechlorane™ Plus is listed as POP in the Stockholm Convention on Persistent Organic Pollutants (POPs) with a limit value of 1 mg/kg (from February 2025).</p> <p>Dechlorane™ Plus is listed in the Candidate List (REACH).</p> <p>In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).</p>
Test method:	<p>IEC 62321-3-2 (screening combustion-IC total chlorine) IEC 62321-3-3 (screening with pyrolyser/thermal desorption) Test equipment: GC-MS, LC-MS, GC-ECD, (XRF to detect chlorine). LOQ: 100 mg/kg</p>

Flame retardants - Hexabromocyclododecan (HBCDD)



Required limit value:	Should not be present in products.
CAS RN:	Hexabromocyclododecane (HBCDD): 25637-99-4, 3194-55-6, 134237-50-6, 134237-51-7 and 134237-52-8
Properties:	<p>Persistent, bioaccumulative and toxic. Halogenated organic additives in polymers may leach out and have a negative impact on health and environment.</p> <p>Halogen containing polymers may form highly corrosive substances and an undefined range of halogenated substances that may be PBT or CMR when incinerated.</p>
Use:	Flame-retardant treatment of products, where fire protection is required. Mainly used in HIPS (range 5% to 7%). Also used in packaging flakes made of polystyrene (PS).
Comments:	Alternative plasticizers and flame retardants are available but must be evaluated. Halogen-free alternatives include phosphorus- and nitrogen-based flame retardants and non-chemical barrier technologies.
Legal background:	<p>Legal limit: Shall not occur.</p> <p>Hexabromocyclododecane is listed as POP in the Stockholm Convention on Persistent Organic Pollutants (POPs) and is banned in EU by Regulation (EU) No 2019/1021. Residues below 75 mg/kg are allowed to be placed on the market and used, as this amount may be present as an impurity.</p>
Test method:	<p>IEC 62321-9 (HBCDD) IEC 62321-6 (PBB, PBDE) IEC 62321-3-1 (screening XRF total bromine) IEC 62321-3-2 (screening combustion-IC total bromine)</p> <p>IEC 62321-3-3 (screening with pyrolyser/thermal desorption accessory GC-MS)</p> <p>Test equipment: GC-MS, LC-MS, GC-ECD LOQ: 20 mg/kg.</p>

Flame retardants – Polybrominated biphenyls (PBBs) and Polybrominated diphenyl ethers (PBDEs)



Required limit value:	Should not be present in products.
CAS RN:	Several Polybromerade biphenyl (PBBs):59536-65-1((commercial mixture, consists of several PBBs) Hexabromobiphenyl (HBB, main component in commercial PBB mixtures): 36355-01-8 Tetrabromodiphenyl ether (TetraBDE): e.g. 5436-43-1 Penta bromo biphenyl ether (pentaBDE): e.g. 32534-81-9, 60348-60-9 Hexa bromo biphenyl ether (HexaBDE): e.g. 68631-49-2, 207122-15-4, Heptabromodiphenyl ether (HeptaBDE): e.g. 207122-16-5, 446255-22-7 Octa bromo biphenyl ether (OctaBDE): e.g. 32536-52-0 Deca bromo biphenyl ether (DecaBDE): 1163-19-5
Properties:	Persistent, bioaccumulative and toxic
Use:	Flame-retardant treatment of products where fire protection is required.
Comments:	Alternative plasticizers and flame retardants are available but must be evaluated. Halogen-free alternatives include phosphorus- and nitrogen-based flame retardants and non-chemical barrier technologies.
Legal limit:	1000 ppm in homogenous material ³ Directive 2011/65/EC of the European Parliament and of the Council (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment. TetraBDE, PentaBDE, HexaBDE, HeptaBDE and DecaBDE (i.e. the main components in commercial Penta- Octa- and DecaBDE mixtures) and HBB are listed as POPs in the Stockholm Convention on Persistent Organic Pollutants

³ The RoHS substance restrictions apply to every individual homogenous material in the part. Exemptions are given in Appendix 1

(POPs) and are banned in EU by the POPs regulation (EU No 2019/1021. Annex I (substances that are banned and not allowed in products. Legal limit in mixtures and articles; 500 ppm. The maximum allowed concentration of unintentional trace contaminants (sum of tetra-, penta-, hexa-, hepta- and decaBDEs) is 10 mg/kg. For recycled materials the corresponding limit value is 350 mg/kg (and from Dec 30 2027: 200 mg/kg).

OctaBDE is restricted in Entry 45 of Annex XVII to Regulation (EC) No 1907/2006 (REACH). The legal limit for OctaBDE in substances and mixtures is 0.1 % by weight. The legal limit for OctaBDE in articles or in flame-retardant parts of articles that are not covered by the RoHS-directive is 0.1 % by weight.

DecaBDE is listed on the Candidate List (REACH).

PBBs are listed in the Rotterdam Convention

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Test method:

IEC 62321-6

IEC 62321-3-1 (screening total bromine)

IEC 62321-3-2 (total bromine)

IEC 62321-3-3 (screening with pyrolyser/thermal desorption accessory GC-MS)

EN 16377 for PBB (plastics)

Test equipment: 1) XRF. 2) GC-MS, LC-MS, GC-ECD LOQ:
1) 50 mg/kg as Br. 2) 10 mg/kg.

IEC 62321-9 (HBCDD)

IEC 62321-12 (GC-MS)

Flame retardants – Tetrabromobisphenol A, TBBPA



Required limit value:	Should not be present in products.
CAS RN:	79-94-7
Properties:	Carcinogenic
Use:	Mainly used as a reactive flame-retardant component in epoxy-coated circuit board, Additive flame retardant in polymers, i.e. ABS, PS, etc
Legal background:	Legal limit: 0.1% by weight TBBPA is listed in the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGECL legislation (LOI n° 2020-105).
Test method:	IEC 62321-3-1 (screening XRF total bromine) IEC 62321-3-2 (screening combustion-IC total bromine) Test equipment: GC-MS, LC-MS, GC-ECD LOQ: 5 mg/kg

Flame retardants / Plasticizers – Trisubstituted phosphates



Required limit value:	Should not be present in products.
CAS RN:	Trixylyl phosphate: 25155-23-1, Isopropylated, phenyl phosphate (3:1): 68937-41-7 Triphenyl phosphate (TPP) 115-86-6
Properties:	Toxic for reproduction
Use:	Plasticizer and flame retardant of PVC and PU. Mainly used as functional fluid. Plasticizer of vinylite (a copolymer of vinyl chloride and vinyl acetate), cellulosic resins and natural and synthetic rubber.
Legal background:	Legal limit: 0.1% by weight Trixylyl phosphate 25155-23-1, , 68937-41-7 and triphenyl phosphate 115-86-6 are on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS, LC-MS, GC-ECD LOQ: 5 mg/kg

Flame retardants – Other halogenated flame retardants



Required limit value:

Should not be present in products

Properties:

Hazardous halogenated substances are difficult to break down and accumulate in humans, animals and plants - with cancerous risks and harmful effects on hormonal functions. Brominated and chlorinated flame retardants are restricted in several companies RSL and in environmental labeling systems, due to their hazardous environmental and health properties

Use:

As flame retardant and/or as plasticizers.

Comments:

There are several non-halogenated flame retardants with low effects on human and nature that may be used as alternatives. Different flame retardant systems fit different plastic material and must be evaluated from case to case. Some examples of alternatives and use are listed in table below:

Alternative substance	Used in plastics
Aluminium trihydroxide (ATH)	Polyolefins, EVA, PVC etc
Magnesium hydroxide	Polyolefins, EVA, PVC etc
Red phosphorus	fibreglass-reinforced polyamides
Ammonium polyphosphate (APP)	polyamides and polyolefins if combined with suitable synergists
Antimony trioxide (ATO)	flame retardant properties in combination with halogen containing polymers (e.g PVC)
Zinc borates	Zinc borates (used mainly in PVC) cannot be used alone to achieve desired flame retardant properties in polymers, since it is used as synergist together with other flame retardants
Zinc hydroxystannate (ZHS) and Zinc stannate (ZS)	ZHS and ZS have primarily found use as alternative non-toxic synergists to antimony trioxide in PVC and other halogen-containing polymer systems.
Aryl phosphates	PVC, HIPS and styrenics. Note some of the aryl phosphates are

	restricted (included in this guide, see 'Trisubstituted phosphates')
Di hydro-oxaphosphaphenanthrene oxide (DOPO)	used to make phosphorus containing epoxy resins for printed circuit boards
Metal-phosphinates	glass fibre reinforced polyamides and polyesters
Nitrogen based organic flame-retardants	Melamine plastics

Legal background: Halogenated flame retardants are restricted in plastic enclosures and stands of electronic displays, regulation (EU) 2019/2021, the ecodesign requirements for electronic displays (100cm² Display).

Several halogenated flame retardants have been restricted globally; see specific substances in this guide.

Some halogenated flame retardants, including 1,1'-[ethane-1,2-diylbis(oxy)]bis[2,4,6-tribromobenzene] (BTBPE, CAS RN: 37853-59-1), Bis(2-ethylhexyl) tetrabromophthalate (TBPH, CAS RN 26040-51-7), 2,2-bis(bromomethyl)propane-1,3-diol (BMP, CAS RN 3296-90-0), 2,2-dimethylpropan-1-ol, tribromo derivative/3-bromo-2,2-bis(bromomethyl)-1-propanol (TBNP, CAS RN 36483-57-5, 1522-92-5), 2,3-dibromo-1-propanol (2,3-DBPA, CAS RN 96-13-9) and Decabromodiphenylethane (DBDPE), CAS RN 84852-53-9 are on the Candidate List (REACH).

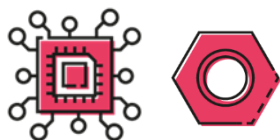
In addition to these, there is a huge number of other halogenated substances that are not legally restricted. However there are industry standards defining "halogen free" "low halogen electronics" etc, see appendix 7.

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Test method: IEC 62321-3-1 (screening XRF total bromine)
IEC 62321-3-2 (screening combustion-IC total bromine)

IEC 62321-3-3 (screening with pyrolyser/thermal desorption accessory GC-MS)
Bromine and chloride containing substances can be detected by for instance XRF, combustion ion chromatography, AAS and ICP.

Gold



Required limit value:	Gold originated from conflict areas should not be present in products.
CAS RN:	7440-57-5
Properties:	Good chemical resistance and conductivity properties. Conflict mineral
Use:	Corrosion-free electrical connectors in electrical devices.
Comments:	Assure and promote ethical and responsible sourcing of gold.
Legal background:	Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. Section 1502 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (USA)
Test method:	No standardised test method available. Test equipment: XRF, AAS, ICP.

Lead (Pb) and lead salts



Required limit value: Should not be present in products.

CAS RN: Lead (metal): 7439-92-1

Properties: Lead exposure can give rise to a number of negative health effects, including damage to liver, nervous system and fetuses. Lead is mainly accumulated in bone tissue. It has a very long half-life in the human body. Use of lead in plastics has not been deemed to cause any significant environmental or health effects in the short term, but in the long term such use increases lead concentrations in the environment.

Use: Solder. Lead salts are additives in plastics (pigments/colourants). Lead based stabilizers increase the service of life of the material (cables/cords). Rubber hardener, pigment, materials for battery, (zinc carbon batteries, alkaline button cells), optical materials, X-ray shielding in CRT glass, ferroelectrics. Metallic surface coating. For recycled packaging material lead may have had a different original use. Lead metal can also be used to increase ductility of other metals. Piezoelectronic PZT components (i.e buzzers) consist mainly of lead (P), zirconium (Z), titanium (T) (Lead zirconium titanium oxide is an SVHC). These components are exempted in RoHS directive however lead titanium zirconium oxide and lead titanium trioxide are listed in Candidate list.

Comments: Alternatives are available, such as lead-free solder. Alternative stabilizers are barium/zinc, potassium/zinc or calcium, calcium/zinc organic stabilisers. Alternative catalysts can be organotitanate or zirconate compounds (e.g. titanium 2-ethylhexanoate) or amines such as bis- (dimethylaminoethyl) ether (BDMAEE) and triethylenediamine (TEDA) along with organometallic compounds such as potassium acetate.

Legal limit: 1000 ppm in homogenous material⁴

⁴ The RoHS substance restrictions apply to every individual homogenous material in the part. are given in Appendix I

Directive 2011/65/EC of the European Parliament and of the Council (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment

Lead and lead salts are listed both on the Candidate List (REACH). SVHC lead compounds are listed in Appendix 4.

0.01 weight% in portable batteries (expressed as lead metal). (Applies to zinc-air button cells from 18 Aug 2028). Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries. Batteries exempted (e.g. lead-acid batteries) from lead restriction must be labeled.

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

Lead salts are restricted in paint products (no restriction on painted articles) within the EU, entry 16 (lead carbonates) and 17 (lead sulphates). Lead and its compounds are restricted in jewellery articles within EU with a legal limit: 500 mg/kg (0.05%). Lead and its compounds are restricted in articles that may be placed in the mouth by children with the legal limit 500 mg/kg (0.05%)⁵, entry 63. Annex XVII of Regulation (EC) No 1907/2006 of the European Commission.

Danish legal limits: 100 mg/kg. (*Bekendgørelse nr. 856 af 5. September 2009 om forbud mod import og salg af produkter, der indeholder bly*).

The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed 100 mg/kg. Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste

Test method:

IEC 62321-3-1 (screening XRF lead)

IEC 62321-5 (AAS, AFS, ICP-OES and ICP-MS)

⁵ The limit does not apply if the rate of lead release is 0.05 µg/cm. per hour (equivalent to 0.05 µg/g/h) or lower. For coated articles, this release rate must not be exceeded for at least two years of use.

ISO 19050 (rubber)

Test equipment: 1) XRF. 2) AAS, ICP-MS and ICP-OES

LOQ: 1) 50 mg/kg as lead. 2) 10 mg/kg as lead

Mercury



Required limit value:	Should not be present in products.
CAS RN:	Mercury (metal): 7439-97-6 Phenylmercury neodecanoat: 26545-49-3 Phenylmercury octanoate: 13864-38-5 Phenylmercury 2-ethylhexanoate: 13302-00-6 Phenylmercury propionate: 103-27-5 Phenylmercury acetate: 62-38-4
Properties:	Heavy metal that occurs naturally in small quantities in nature. Toxic to aquatic organisms. Non-biodegradable. Dangerous for the environment. Can cause kidney damage.
Use:	In lamps. Metal construction parts. Relays and switches. In batteries; silver-oxide button cells, alkaline batteries, zinc carbon batteries. Phenylmercury compound are used as catalysts in the production of polyurethane coatings, adhesives, sealants and elastomers.
Comments:	LED lamps contain no mercury. Order mercury-free processes and materials. Battery alternatives are available, such as nickel-zinc (NiZn), nickel metal hydride (NiMH) and lithium-ion (Li-ion) batteries.
Legal limit:	1000 ppm in homogenous material ⁶ Directive 2011/65/EC, (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment Legal limit in batteries: 0.0005 weight% in batteries (expressed as mercury metal). Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries.

⁶ The RoHS substance restrictions apply to every individual homogenous material in the part. are given in Appendix 1

Phenylmercury compounds are restricted in articles (0.01 %) in Annex XVII, Regulation (EC) No 1907/2006, REACH, entry 62.

Products containing mercury may not be placed on the Swedish market.

Norway prohibits the manufacture, import, export and sale of articles that contain mercury or mercury compounds (0.001% (10 ppm).

Denmark prohibits the import, export and sale of articles and part of articles that contain mercury or mercury compounds (0.01% (100 ppm).

Regulation (EU) 2017/852 of the European Parliament and of the Council of 17 May 2017 on mercury restricts the export, import, use, storage and manufacturing of mercury.

Mercury is under restriction globally through the Minamata Convention.

The sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in packaging or packaging components shall not exceed 100 mg/kg.

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste

Mercury and its compounds are listed in the Rotterdam convention.

Test method:

IEC 62321-4

ISO 19050 (rubber)

Test equipment: 1) XRF. 2) AAS, ICP-MS and ICP-OES

LOQ: 1) 50 mg/kg. 2) 10 mg/kg

Nickel (Ni) in skin contact



Required limit value: 0.5 µg per cm² and week for products intended to come into direct and prolonged contact with the skin.

CAS RN: Nickel (metal): 7440-02-0

Properties: Nickel is one of the most common substances that cause contact dermatitis. Highly allergenic (strong skin sensitizer). Suspected carcinogenic.

Use: Example application for prolonged skin contact is an ear bud (headphone), mobile phone.

Comments: Refrain from using nickel-treated metals or nickel-containing metal coatings.

Legal limit: 0.5 µg per cm² and week for products intended to come into direct and prolonged contact with the skin.

Annex XVII of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (REACH), entry 27.

Test method: Test method I: EN 12472:2020 and EN 1811:2023 (for coated items)
1811:2023 (for non-coated item).
Detection limit I: 0.01 µg/cm²/week

Test method II: Screening test for nickel emission. Swedish pharmacies sell a test kit.

Detection limit II: Qualitative indication only = no occurrence. (This screening method can also give a reading for other metals than Ni.)

Triphenyl thiophosphate and related substances

Required limit value:	Should not be present in products.
CAS RN:	O,O,O-triphenyl thiophosphate: 7440-02-0 Reaction mass of: triphenyl thiophosphate and tertiary butylated phenyl derivatives, 192268-65-8
Properties:	Persistent, Bioaccumulative and Toxic
Comments:	Trade name Irgalube® TPPT
Use:	Used as anti-wear, pressure, corrosion prevention and lubricant stability additives. Used in cooling liquids in refrigerators and oil-based electric heaters
Legal limit:	O,O,O-triphenyl thiophosphate: 7440-02-0 and reaction mass of triphenyl thiophosphate and tertiary butylated phenyl derivatives, 192268-65-8, are on the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS

Perchlorates



Required limit value:	60 ppm in batteries.
CAS RN:	Perchlorate; 14797-73-0
Properties:	Perchlorate is a strong oxidiser and explosive
Use:	Lithium batteries; coin cell batteries
Legal limit:	60 ppm in batteries. California Assembly Bill No. 826 - Perchlorate Contamination Prevention Act (Labelling requirement). Several regions have restrictions regarding transports of lithium batteries.
Test method:	No standardised test method available. Test equipment: LC-MS

PFAS - Highly fluorinated carboxylic acids (PFOA and related substances)



Required limit value:	Should not be present in products.
CAS RN:	Several, including: 335-67-1
Properties:	Highly fluorinated carboxylic acids (PFCAs) such as PFOA are persistent, bioaccumulative and toxic (PBT) substances. PFOA is a carcinogen.
Uses (examples):	<p>Per and polyfluorinated chemicals (PFAS) are surfactants, stable, temperature-resistant and water- and grease-repellent substances.</p> <ul style="list-style-type: none">• Fluoropolymers (PVDF) for Li ion batteries• Superconductors• Antireflection layers for displays• Nonfoaming surfactants for metal electrowinning• Liquid crystal display retardation films• Anti-bleed agents for adhesives in semiconductor devices• Surfactants in ink for printers / photocopy machines• Cationic surfactant for electro deposition of tin. <p>Degradation products from additives in cleaning agents, fire extinguishing agents, metal plating and impregnation agents in leather and textiles. PFOA is used as an emulsifier in the production of fluoropolymers such as polytetrafluoroethylene (PTFE) fluoroethylene propylene (FEP), polyvinylidene fluoride (PVDF) etc.</p>
Legal background:	<p>Legal limit: Shall not occur</p> <p>PFOA, its salts and related compounds, Long-chain perfluorocarboxylic acids (LC-PFCA, C9-C21), their salts, and related substances are listed in the Stockholm Convention on Persistent Organic Pollutants (POPs). PFOA its salts and related compounds banned in EU by the POPs Regulation (EU) No 2019/1021. Residues below 0.025 mg/kg of each substance, and 1 mg/kg of a combination of PFOA-related substances in substances, mixtures, and articles are allowed to be placed on the market and used, as these are amounts that may be present as impurities.</p>

Perfluoroheptanoic acid and its salts as well as long chain PFCAs (C8-C14) including their salts (sodium and ammonium) and precursors are listed in the Candidate List (REACH). Listed below:

- Ammonium perfluoroheptanoate, 6130-43-4
- Potassium perfluoroheptanoate, 21049-36-5
- Perfluoroheptanoic acid, 375-85-9
- Sodium perfluoroheptanoate, 20109-59-5
- (C8) Pentadecafluorooctanoic acid (PFOA), 335-67-1 and its Ammonium salt (APFO), 3825-26-1,
- (C9) Perfluorononan-1-oic-acid (PFNA) and its sodium and ammonium salts, 375-95-1, 21049-39-8, 4149-60-4, 4 and (C10) Nonadecafluorodecanoic acid (PFDA) and its sodium and ammonium salts, 335-76-2, 3108-42-7, 3830-45-3, (C11) Henicosafluoroundecanoic acid (PFUnA), 2058-94-8 (C12) Tricosafluorododecanoic acid (PFDoA), 307-55-1,
- (C13) Pentacosafuorotridecanoic acid (PFTTrDA), 72629-94-8, (14) Heptacosafuorotetradecanoic acid (PFTA), 376-06-7.
- Perfluamine, 338-83-0.

C9-C14 linear and/or branched perfluorocarboxylic acids (C9-C14 PFCAs) are restricted in articles, (25 ppb for the sum of C9-C14 PFCAs and their salts and 260 ppb for the sum of C9-C14 PFCAs-related substances) annex XVII Regulation (EC) No 1907/2006 (REACH), entry 68. (3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl) silanetriol is restricted in spray products (2 ppb) annex XVII Regulation (EC) No 1907/2006 (REACH), entry 73.

In France: The substances on the Candidate List are included under the AGECE legislation (LOI n° 2020-105).

Declaration duty in Sweden to the Swedish Chemicals Agency for PFAS in chemical products that are deliberately added.

Test method:

IEC 62321-3-2 (Screening – Fluorine by combustion-ion chromatography (C-IC))
EN 14582 (total fluorine)
No standardised test method available.
Test equipment: LC-MS
LOQ: 10 µg/kg.

Phthalate esters



Required limit value:	0.1% by weight (1000 mg/kg) in the material of interest.
CAS RN:	Various, se appendix 8
Properties:	Many phthalates are classified as toxic for reproduction DIDP is of concern in connection with hepatic toxicity. Many phthalates are suspected endocrine disrupters.
Use:	Phthalates may be used as plasticizers in polymers. Additives in adhesives, paints, lacquers, varnishes and solvents.
Comments:	Alternative plasticizers include citrates, sebacates, adipates, and phosphates etc. The terephthalate, DEHT and the cyclohexane DINCH are example of commercially available alternatives with low human and environmental toxicity. There are also plastics that do not require phthalates.
Legal background:	<p>1000 ppm in homogenous material for DEHP, DBP, BBP and DIBP, Directive 2011/65/EC of the European Parliament and of the Council (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment.</p> <p>Phthalate ester substances listed in both Annex XIV and/ or the Candidate List (REACH) is found in Appendix 8</p> <p>All phthalates in toys and childcare articles for children aged 0-3 years are restricted (0.05%) in Denmark (BEK nr 855).</p> <p>In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).</p>
Test method:	IEC 62321-8 IEC 62321-3-3 and -3-4 IEC 62321-12 (GC-MS) EN-ISO 14389 Test equipment: GC-MS, LC-MS LOQ: 50 mg/kg

1,3-propanesultone



Required limit value:	Should not be present in products.
CAS RN:	1120-71-4
Properties:	Carcinogenic.
Use:	Electrolyte fluid of lithium ion batteries.
Comments:	When heated to decomposition, it emits toxic fumes of sulphur oxides.
Legal background:	Legal limit: 0.1% by weight 1,3-propanesultone is listed in the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105). .
Test method:	No standardised test method available. Test equipment: GC-MS, LC-MS, GC-ECD

Siloxanes



Required limit value: 1000 mg/kg (0.1% by weight)

CAS RN: 107-51-7 Octamethyltrisiloxane (L3)
141-62-8 Decamethyltetrasiloxane (L4)
556-67-2 Octamethylcyclotetrasiloxane (D4)
541-02-6 Decamethylcyclopentasiloxane (D5)
540-97-6 Dodecamethylcyclohexasiloxane (D6)

Properties: Reproduction toxic. Toxic to aquatic life with long lasting effects.

Use: Paper and cardboard products, electronic equipment e.g. semiconductors. Precursors in the production of polymers, such as silicone rubbers. Sealants for construction.

Legal limit: L3, L4, D4, D5 and D6 are listed in the Candidate List (REACH).

In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).

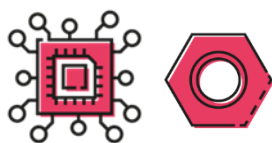
Test method: No standardised test methods
Test equipment: GC-MS
LOQ: 100 mg/kg

Tantalum



Required limit value:	Tantalum originated from conflict areas should not be present in products.
CAS RN:	7440-25-7
Properties:	Highly corrosion-resistant and chemical inert. Conflict mineral
Use:	Ta-capacitors.
Comments:	Assure and promote ethical and responsible sourcing of Tantalum. In some application Platinum can be a substitute.
Legal background:	Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.
Test method:	No standardised test method available. Test equipment: XRF, AAS, ICP

Tin



Required limit value:	Tin originated from conflict areas should not be present in products.
CAS RN:	7440-31-5
Properties:	Alloy metal. Corrosion resistant. Conflict mineral.
Use:	Solder. Metal plating.
Comments:	Assure and promote ethical and responsible sourcing of Tin.
Legal background:	Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict affected and high-risk areas.
Test method:	No standardised test method available. Test equipment: XRF, AAS, ICP.

Tungsten



Required limit value:	Tungsten originated from conflict areas should not be present in products.
CAS RN:	7440-33-7
Properties:	Robust and hard mineral with high melting point. Conflict mineral.
Use:	Used in light bulb filaments, X-ray tubes (as both the filament and target), electrodes in TIG welding, superalloys, and radiation shielding.
Comments:	Tungsten is also known as wolfram. Assure and promote ethical and responsible sourcing of Tungsten.
Legal background:	Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.
Test method:	No standardised test method available. Test equipment: XRF, AAS, ICP.

UV stabilisers



Required limit value:	Should not be present in products.
CAS RN:	2-benzotriazol-2-yl-4,6-di-tert-butylphenol (UV-320); 3846-71-7 2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327); 3864-99-1 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328); 25973-55-1 2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350); 36437-37-3 2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol (UV-329), 3147-75-9 Bumetrizole (UV-326) 3896-11-5 3-benzylidene camphor (3-BC); 15087-24-8 6,6'-di-tert-butyl-2,2'-methylenedi-p-cresol (DBMC); 119-47-1
Properties:	Persistent, Bioaccumulative and Toxic Very Persistent and very Bioaccumulative
Use:	UV-stabilizer for plastics, polyurethanes and rubber and constituent in formulations used for coating of surfaces, e.g. cars or special industrial wood coatings. Also used in dishwasher detergents, dry cleaning equipment, and de-icing/anti-icing fluids. DBMC is an antioxidant and/or stabilizers used in plastic and rubber.
Legal background:	UV-328 is listed as POP in the Stockholm Convention on Persistent Organic Pollutants (POPs) with a limit value of 1 mg/kg (from February 2025). UV-320, UV-326, UV-327, UV-328, UV-328, UV-350, 3-BC and DBMC are listed in the Candidate List (REACH). In France: The substances on the Candidate List are included under the AGEC legislation (LOI n° 2020-105).
Test method:	No standardised test method available. Test equipment: GC-MS, LC-MS, GC-ECD LOQ: 50 mg/kg (benzotriazoles) LOQ: 100 mg/kg (DBMC)

BIOCIDAL AGENTS

General information

Biocidal agents are widely used in textile and leather production, both as **process chemicals** to prohibit growth of bacteria or mold in materials and liquids during production, and as **product-related chemicals** (e.g. anti-bacterial treatment).

Articles at the EU market can have a biocidal treatment ONLY IF that biocide is approved for the specific use (as regulated in the Biocidal product regulation, BPR (EU 528/2012)). Some biocides are additionally regulated in the REACH regulation or in the POPs regulation.

Biocidal agents



Required limit value:	Should not be present in products.
CAS RN:	Examples of biocides that are not approved in all or some of the applications in the scope of this guidance are listed in Appendix 2.
Properties:	Many biocidal agents have hazardous properties to human or the environment.
Use:	Bactericides and fungicides during production and storage to protect processing fluids or materials from deterioration. Fungicides to protect (plastic, leather) articles from deterioration. Insect repellents and attractants, and insecticides (used in electronic devices) to protect human or pet. Virucides, bactericides, fungicides etcetera added to article to protect human from disease.
Comments:	The use of biocidal agents in articles should be limited, unless the use is essential to the product or process function.
Legal background:	Only approved biocides are allowed in the EU and in treated articles on the EU market (the Biocidal product regulation, BPR EU 528/2012). The approval status for the same chemical substances often varies for the product

groups within our scope. Read about approved biocides at the Chemicals group webpage.

PCP and its salts and esters are listed in the Stockholm Convention on Persistent Organic Pollutants (POPs) and banned in EU by the POPs Regulation (EU) No 2019/1021. Residues below 5 mg/kg in substances, mixtures, and articles are allowed to be placed on the market and used, as this is the amount that may be present as an impurity in an article.

DMFu is restricted in Annex XVII of Regulation (EC) No 1907/2006 (REACH), entry 61 to 0.00001 % by weight (0.1 mg/kg) in articles or any parts of articles.

All trisubstituted tin organic compounds such as tributyltin (TBT) are restricted to 0.1 % by weight in articles in annex XVII of the Regulation (EC) No 1907/2006 (REACH), entry 20.

Glutaral and Tributyltin oxide (TBTO) are listed on the Candidate List (REACH).

In France: The substances on the REACH Candidate List are included in the AGEC legislation (LOI n° 2020-105).

Seven TBT compounds and Pentachlorophenol are listed in the Rotterdam convention.

Test method:

Various for different biocides, including:

ISO/TS 16186 (DMFu in footwear)
SS-EN 17130 (DMFu in textile and textile material)
EN 17134-2 (PCP in textile at LOQ 0.1 mg/kg)
ISO 17070 (PCP in leather at LOQ 0.1 mg/kg)
XP G 08-015 (French standard method for PCP in textiles at LOQ 0.1 mg/kg).
CEN/TR 14823 (PCP in wood) at detection limit 25 mg/kg
EN ISO 15320 (PCP in pulp, paper and board)
EN ISO 22517 (Permethrin in leather)
EN ISO 22744-1, -2 (Trisubstituted tin organic compounds in textiles)
ISO/TS 16179 (Trisubstituted tin organic compounds)

MISCELLANEOUS

Synthetic polymer microparticles

Limit value:	Shall not be placed on the market.
Comments:	The microplastics restriction concerns synthetic polymer microparticles - better known as microplastics - on their own or intentionally added to mixtures. Articles are not in the scope. The purpose of banning microplastics, which includes glitter, is to reduce the environmental pollution and risk to the environment that they cause.
Legal background:	Annex XVII of Regulation (EC) No 1907/2006 (REACH), entry 78
Test method:	No standardised test method available.

Appendix 1 – Exemptions in RoHS

All exemptions in RoHS directive are found at [Implementation of the RoHS Directive - European Commission \(europa.eu\)](#).

Appendix 2 – Examples of non-approved Biocidal agents

Examples of biocides that are not approved or that are only approved for some applications in the scope of this guidance. Only approved biocides are allowed in the EU and in treated articles on the EU market. Some biocides are additionally restricted in the EU by REACH Annex XVII or the POPs regulation and some are listed in the Candidate List of Substances of Very High Concern for authorization of Regulation (EC) No 1907/2006 (REACH) and/or the French AGEC legislation (LOI n° 2020-105).

Name	Target organisms	CAS RN	SVHC, AGEC	REACH	POPs
Carbendazim	Fungi/Mold	10605-21-7			
Chlorophenols, including - PCP and its salts and esters	Fungi/Mold	e.g. 87-86-5, 131-52-2.			X
- TeCP		935-95-5, 4901-51-3, 58-90-2			
Cu-HDO (Bis-(N-cyclohexyl diazeniumdioxy)-copper)	Fungi/Mold	312600-89-8			
DMFu – Dimethylfumarate	Fungi/Mold	624-49-7		X	
Formaldehyde	Several	50-00-0	X	X	
Glutaral	Several	111-30-8	X		
o-phenylphenol (OPP) and Sodium 2-biphenylate (Na-OPP)	Fungi/Mold	90-43-7, 132-27-4			
Permethrin, d-allethrin, Prallethrin, esbiothrin, metofluthrin and empenthrin Some other pyrethroids are approved.	Insects	Several			
Polyhexamethylene biguanide (PHMB)	Bacteria	e.g. 27083-27-8, 32289-58-0, 1802181-67-4			
Silver, silver-salts and nano-silver compounds.	Bacteria	Several			
Triclosan and Triclocarban	Bacteria	3380-34-5, 101-20-2			
Triflumuron	Insects	64628-44-0			
Trisubstituted tin organic compounds, including	Bacteria	e.g. 1461-22-9, 1983-10-4, 2155-70-6, 4342-36-3, 24124-25-2, 85409-17-2		X	
- Tributyltin oxide (TBTO)		56-35-9	X	X	
Zinkpyrithion	Several	13463-41-7			

Appendix 3 – Chromium VI compounds

All substances containing chromium VI – also the ones not listed here – are restricted by REACH Annex XVII Entries 47 and 72. This table lists chromium VI substances listed in Annex XVII, the Candidate List of Substances of Very High Concern for authorization of Regulation (EC) No 1907/2006 (REACH) and/or the French AGEC legislation (LOI n° 2020-105).

Name	CAS RN	Candidate list and AGEC	Annex XVII (entry 47, entry 72)
Chromium VI		x	x
Ammonium dichromate	7789-09-5	x	x
Potassium chromate	7789-00-6	x	x
Potassium dichromate	7778-50-9	x	x
Sodium chromate	7775-11-3	x	x
Sodium dichromate	7789-12-0, 10588-01-9		x
Strontium chromate	7789-06-2	x	x
Chromium trioxide	1333-82-0	x	x
Chromic acid	7738-94-5	x	x
Dichromic acid	13530-68-2	x	x
Lead chromate	7758-97-6	x	x
Lead sulfochromate yellow (C.I. Pigment Yellow 34)	1344-37-2	x	x
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	12656-85-8	x	x
Dichromium tris(chromate)	24613-89-6	x	x
Potassium hydroxyoctaoxidizincatedichromate	11103-86-9	x	x
Pentazinc chromate octahydroxide	49663-84-5	x	x

* All chromium VI containing substances (also the ones not listed here) are covered by the chromium restrictions.

Appendix 4 – Lead and its compounds

All substances containing lead – also the ones not listed here – are restricted by REACH Annex XVII Entries 63 and 72. This table lists lead substances listed in the Candidate List of Substances of Very High Concern for authorization of Regulation (EC) No 1907/2006 (REACH) and/or the French AGEC legislation (LOI n° 2020-105).

Name	CAS RN	Candidate list and AGEC	Annex XVII (entry 63, entry 72)*
Lead (metal)	7439-92-1	x	x
Lead chromate	7758-97-6	x	x
Lead sulfochromate	1344-37-2	x	x
Lead chromate molybdate sulphate	12656-85-8	x	x
Lead dipicrate	6477-64-1	x	x
Lead styphnate	15245-44-0	x	x
Lead diazide	13424-46-9	x	x
Lead hydrogen arsenate	7784-40-9	x	x
Lead monoxide (Lead oxide)	1317-36-8	x	x
Orange lead (Lead tetroxide)	1314-41-6	x	x
Lead bis(tetrafluoroborate)	13814-96-5	x	x
Trilead bis(carbonate)dihydroxide	1319-46-6	x	x
Lead titanium trioxide	12060-00-3	x	x
Lead titanium zirconium oxide	12626-81-2	x	x
Lead(II) bis(methanesulfonate)	17570-76-2	x	x
Silicic acid, lead salt	11120-22-2	x	x
Silicic acid (H ₂ Si ₂ O ₅), barium salt (1:1), lead-doped	68784-75-8	x	x
Acetic acid, lead salt, basic	51404-69-4	x	x
Lead oxide sulfate	12036-76-9	x	x
[Phthalato(2-)]dioxotrilead	69011-06-9	x	x
Dioxobis(stearato)trilead	12578-12-0	x	x
Fatty acids, C16-18, lead salts	91031-62-8	x	x
Lead cyanamide	20837-86-9	x	x
Lead dinitrate	10099-74-8	x	x
Pentalead tetraoxide sulphate	12065-90-6	x	x
Pyrochlore, antimony lead yellow	8012-00-8	x	x
Sulfurous acid, lead salt, dibasic	62229-08-7	x	x
Tetraethyllead	78-00-2	x	x
Tetralead trioxide sulphate	12202-17-4	x	x
Trilead dioxide phosphonate	12141-20-7	x	x
Lead di(acetate)	301-04-2	x	x
Trilead diarsenate	3687-31-8	x	x

*All lead-containing substances (also the ones not listed here) are covered by the lead restrictions.

Appendix 5 – fluorinated greenhouse gases (not an exhaustive list)

Name	CAS RN
Sulfur hexafluoride - SF ₆	2551-62-4
Hydrofluorocarbons (HFCs)	
HFC-23 - CHF ₃	75-46-7
HFC-32 - CH ₂ F ₂	75-10-5
HFC-41 - CH ₃ F	593-53-3
HFC-43-10mee - C ₅ H ₂ F ₁₀	138495-42-8
HFC-125 - C ₂ H ₅ F	354-33-6
HFC-134 - C ₂ H ₂ F ₄	359-35-3
HFC-134a - CH ₂ FCF ₃	811-97-2
HFC-152a - C ₂ H ₄ F ₂	75-37-6
HFC-143 - C ₂ H ₃ F ₃	430-66-0
HFC-143a - C ₂ H ₃ F ₃	420-46-2
HFC-227ea - C ₃ H ₇ F ₇	431-89-0
HFC-236cb - CH ₂ FCF ₂ CF ₃	677-56-5
HFC-236ea - CHF ₂ CHF ₂ CF ₃	431-63-0
HFC-236fa - C ₃ H ₂ F ₆	690-39-1
HFC-245ca - C ₃ H ₃ F ₅	679-86-7
HFC-245fa - CHF ₂ CH ₂ CF ₃	460-73-1
HFC-365mfc - CF ₃ CH ₂ CF ₂ CH ₃	406-58-6
HFC-43-10 mee, CF ₃ CHFCH ₂ CF ₂ CF ₃	138495-42-8
Perfluorocarbons (PFCs)	
Perfluoromethane - CF ₄	75-73-0
Perfluoroethane - C ₂ F ₆	76-16-4
Perfluoropropane - C ₃ F ₈	76-19-7
Perfluorobutane - C ₄ F ₁₀	355-25-9
Perfluoropentane - C ₅ F ₁₂	678-26-2
Perfluorohexane - C ₆ F ₁₄	355-42-0
Perfluorocyclobutane - c-C ₄ F ₈	115-25-3

Appendix 6 – PAH – Polycyclic aromatic hydrocarbons

PAH substances listed in Annex XVII, the Candidate List of Substances of Very High Concern for authorization of Regulation (EC) No 1907/2006 (REACH) and/or the French AGECE legislation (LOI n° 2020-105). The German GS standard is not legally binding.

Name	CAS RN	Candidate list and AGECE	Annex XVII, Entry 50	German GS standard
Benzo(a)anthracene	56-55-3	x	x	x
Benzo(a)phenanthrene (chrysene)	218-01-9	x	x	x
Benzo(a)pyrene	50-32-8	x	x	x
Benzo(b)fluoranthene	205-99-2		x	x
Benzo(j)fluoranthene	205-82-3		x	x
Benzo(k)fluoranthene	207-08-9	x	x	x
Dibenzo(a,h)anthracene	53-70-3		x	x
Benzo[e]pyrene	192-97-2		x	x
Benzo[ghi]perylene	191-24-2	x		x
Anthracene	120-12-7	x		x
Anthracene oil distillation fractions		x		
Fluoranthene	206-44-0	x		x
Phenanthrene	85-01-8	x		x
Pyrene	129-00-0	x		x
Naphthalene	91-20-3			x
Indeno[1,2,3-cd]pyrene	193-39-5			x

Appendix 7 – Halogen free/low halogen industry standards

Organisation	Concentration, % (ppm)				
	Br	Cl	Br+Cl	BFR	CFR + PVC polymers
1	<0.09 (900)	<0.09 (900)	<0.15 (1500)	n/a	n/a
2, 3, 4	≤0.09 (900)	≤0.09 (900)	<0.15 (1500)	n/a	n/a
5	n/a	n/a	n/a	<0.1 (1000)	<0.1 (1000)
6	n/a	n/a	n/a	<0.1 (1000)	<0.1 (1000)

Bromine (Br), Chlorine (Cl), Brominated Flame Retardant (BFR), Chlorinated Flame Retardant (CFR), Polyvinylchloride (PVC)

- 1) Japan Electronics Packaging and Curcuits Association JPCA-ES-01 (boards)
- 2) European Standard EN 61249-2-21 Identical with IEC 61249-2-21 (boards)
- 3) IPC-Association Connecting Electronics industries IPC-4101 (boards)
- 4) International Electronics Manufacturing Initiative (boards and substrates laminates, non-halogenated epoxide)
- 5) International Electronics Manufacturing Initiative (plastics)
- 6) IBM Halogenated Flame retardants and Polyvinylchloride material Substrate Specification, EC N28742

Appendix 8 – Phthalate esters

Substances listed in Annex XVII, the Candidate List of Substances of Very High Concern for authorization of Regulation (EC) No 1907/2006 (REACH) and/or the French AGEC legislation (LOI n° 2020-105).

Name	CAS RN	RoHS	Candidate list	Annex XVII	AGEC
Bis (2-ethylhexyl) phthalate (DEHP)	117-81-7	x	x	x (entry 51)	x
Dibutyl phthalate (DBP)	84-74-2	x	x	x (entry 51)	x
Benzyl butyl phthalate (BBP)	85-68-7	x	x	x (entry 51)	x
Diisobutyl phthalate (DIBP)	84-69-5	x	x	x (entry 51)	x
Di-isononyl phthalate (DINP)	28553-12-0 68515-48-0			x (entry 52)	
Di-isodecyl phthalate (DIDP)	26761-40-0 68515-49-1			x (entry 52)	
Di-n-octyl phthalate (DNOP)	117-84-0			x (entry 52)	
1,2-benzenedicarboxylic acid, di-C6-8-branched alkylesters, C7- rich	71888-89-6		x	x (entry 72)	x
Di-n-pentyl phthalate (DPP)	131-18-0		x	x (entry 72)	x
Di-n-hexyl phthalate (DnHP)	84-75-3		x	x (entry 72)	x
Diisopentyl phthalate	605-50-5		x	x (entry 72)	x
Bis (2-methoxyethyl) phthalate	117-82-8		x	x (entry 72)	x
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear	84777-06-0		x		x
n-pentyl-isopentyl phthalate	776297-69-9		x		x
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters	68515-42-4		x		x
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	68515-50-4		x		x
1,2-Benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters, with ≥ 0.3% of dihexyl phthalate	68648-93-1		x		x
1,2-Benzenedicarboxylic acid, di-C6-10-alkyl esters, with ≥ 0.3% of dihexyl phthalate	68515-51-5		x		x
Dicyclohexyl phthalate (DCHP)	84-61-7		x		x
Diisohexyl phthalate	71850-09-4		x		x
Diisooctyl phthalate (DIOP)	27554-26-3				x

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