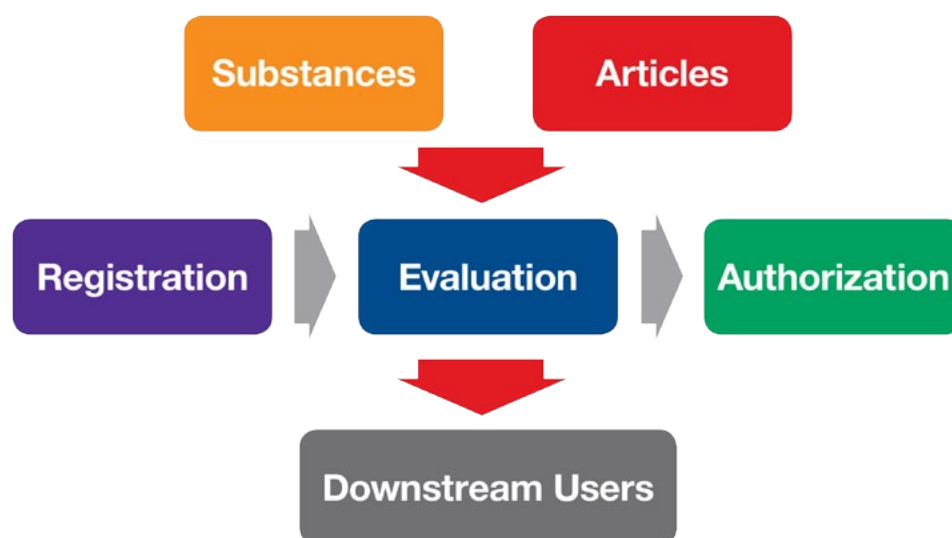


Avery Dennison ADvantage: Complete Compliance

Avery Dennison ADvantage: Complete Compliance is a global service initiative that helps customers navigate the complexities of regulatory, trade and customer compliance issues. Complete Compliance delivers training, tools and

advice that guides customers through regulatory data and certifications to ensure products meet the compliance demands of specific applications.

REACH in the EU



REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) is an EU law designed to place the responsibility on industry to demonstrate safe use of substances, i.e., chemicals. The European Chemicals Agency (ECHA) administers the requirements, and enforcement of REACH is on a country-by-country basis throughout the EU.

Registration

Manufacturers and importers of substances are required to register them, and unregistered substances may not be manufactured or imported after the applicable registration deadline. Downstream users need to provide information to suppliers on substance use and exposure to support the registration process. In some circumstances, article producers may be subject to registration requirements.

Evaluation and Authorization

REACH sets out a complex process to evaluate substances based on information submitted during the registration process, which may result in a conclusion from the authorities that a substance warrants restriction. Restrictions may limit or ban the manufacture, placing on the market or use of a substance. A substance of very high concern (SVHC) may be added to the Authorization List, and then cannot be placed on the market or used after its sunset date unless an authorization is granted.

Hazard Communication

Under REACH, companies assess the hazards and potential risks presented by a substance, and communicate relevant safety information to downstream users. Safety data sheets are the main communication tool between suppliers and users of substances and mixtures. Effective communication between suppliers and downstream users at all stages in the REACH process ensures that important safety information is provided up and down the supply chain.

Avery Dennison REACH Compliance and Customer Support

From the time REACH was proposed, Avery Dennison anticipated the likely impact of REACH on its manufacturing operations. A key priority was to ensure a smooth transition, complying with all relevant aspects of the regulations and avoiding any disruption to customer supplies. As a downstream user of chemicals, Avery Dennison collaborates closely with all suppliers to both achieve and maintain REACH compliance.

Avery Dennison assures its customers that the products we offer comply with REACH. Users of our products have their own obligations under REACH, including:

- Providing information to support registration to suppliers as needed;
- Ensuring that any substances they place on the market in the EU comply with registration requirements and any applicable restrictions;
- Following the advice on the Safety Data Sheet, making sure their uses are consistent with the identified exposure scenarios, and communicating to suppliers any new information related to hazards;
- Providing Safety Data Sheets to their customers if they are a formulator or refiller; and
- Meeting the requirements for producers of articles if they produce articles in the EU.

Avery Dennison's compliance team is part of Avery Dennison's core business and we understand REACH requirements. Avery Dennison's customers have confidence that our products comply with REACH, and we provide support to our customers for their work to meet their own REACH compliance obligations.

ECHA offers a useful collection of guidance documents at:

<http://echa.europa.eu/support/guidance>

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