

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.

TSCA in the U.S.

The Toxic Substances Control Act (TSCA) is the main chemical substances law in the U.S., administered by the Environmental Protection Agency (EPA). This federal law is designed to ensure that chemicals sold and used in the U.S. do not pose an unreasonable risk to health and the environment. TSCA places numerous recordkeeping, reporting, and chemical handling responsibilities on chemical manufacturers, processors, distributors, importers, and exporters.

TSCA Inventory and New Chemicals

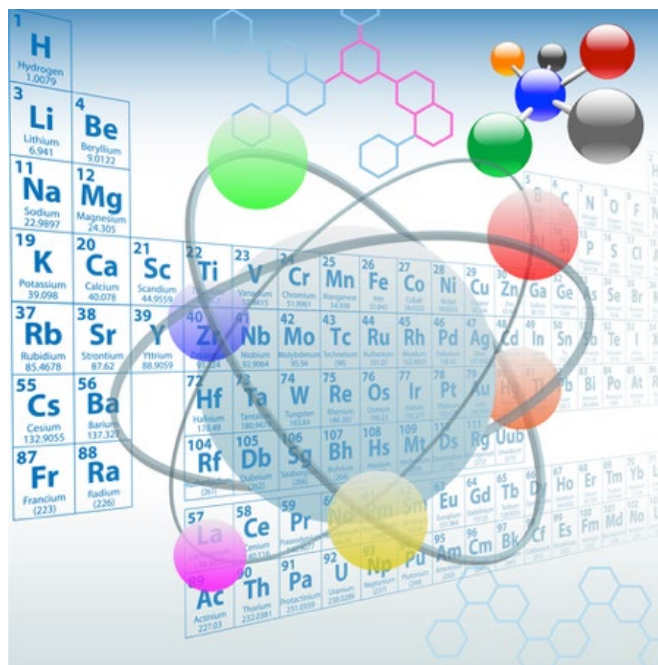
The TSCA Inventory is an EPA list of chemicals manufactured, imported, and processed in the U.S. Any chemical not listed on the TSCA Inventory is considered a “new” chemical under TSCA. A company must submit a Premanufacture Notice (PMN) before manufacturing or importing a new chemical, unless an exemption applies.

Restrictions

EPA may impose restrictions on chemicals that pose health or environmental risk. Chemical-specific consent orders and significant new use rules (SNURs) may impose restrictions such as production limits, required worker protection measures, limits on use and/or distribution, specified disposal methods, recordkeeping requirements, and others. When a chemical is subject to a consent order or SNUR, there are specific regulatory conditions that apply to it.

Testing, Reporting, and Certifying

Under TSCA, the EPA sometimes requires manufacturers and importers of specific chemicals to conduct health or environmental testing on them. In addition, manufacturers and importers of chemicals are subject to periodic information reporting requirements. Companies that handle chemicals may be subject to TSCA rules for keeping records of allegations about chemicals effects, and for reporting any information that indicates a chemical poses a substantial risk to human health or the environment. Finally, importers of chemicals must certify that imported shipments comply with TSCA, and notification to EPA is required for certain exports of chemicals.



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QuickFacts

Avery Dennison's compliance team is part of Avery Dennison's core business and we understand TSCA requirements. The raw materials that Avery Dennison uses to make its products include chemical substances. Avery Dennison has a TSCA compliance program to assure that all chemical substances produced or used in our U.S. operations comply with all applicable TSCA requirements. This includes confirming that chemical substances are on the TSCA Inventory and in compliance with any applicable TSCA requirements for specific chemicals. We monitor TSCA requirements so that we are informed early of any potential forthcoming requirements or restrictions, and can prepare for them.

The U.S. EPA's website on TSCA is at:

www.epa.gov/oppt

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