

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.

California Proposition 65

California Proposition 65, which resulted in the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted in California as a ballot initiative in 1986. Under the law, the U.S. state of California maintains a list of chemicals that meet the state's definition of chemicals known to cause cancer birth defects or reproductive harm. Businesses are required to provide a "clear and reasonable" warning before knowingly and intentionally exposing anyone in California to a listed chemical at a level that poses risk of such harm.

A product need not contain a warning if the company can make a determination of no significant risk and no observable effects, in accordance with the regulations. The California implementing office provides "safe harbor" levels to be used in determining whether a warning is necessary.

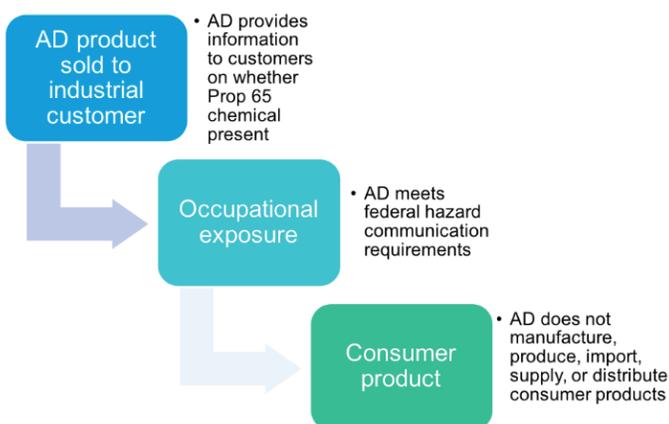
Avery Dennison Product Compliance

Avery Dennison's product compliance team identifies any Proposition 65 chemicals that are present in our products. Even if an Avery Dennison product does not directly expose a person in California to the listed chemical, customers may incorporate our materials into consumer products sold in many jurisdictions including California.

California recently amended its regulations on how regulated parties are expected to provide "clear and reasonable" warning under Prop 65 requirements, with the amendments in effect as of August 30, 2018. Avery Dennison has evaluated the amendments, and has determined we do not require changes to our product labeling.

The amended requirements set out content and method of transmission for consumer product exposure warnings. Avery Dennison products are not consumer products, and thus appropriately do not bear the consumer product warnings. The amended requirements also address occupational exposure warnings. Avery Dennison does comply with federal Hazard Communication Standard (HCS), and the amended California requirements state that a warning to employees meets the Prop 65 requirements if it fully complies with the HCS.

If a California Proposition 65 substance is present in one of our products, information will be available in the Avery Dennison compliance portal.



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