



Todd Tillmann  
Customer Service Supervisor  
1 (262) 247-0481  
Email: [Todd Tillmann](mailto:Todd.Tillmann)

## REACH and RoHS Statement

April 15, 2011

Corrugated packaging converted by Badger Packaging Corporation does not contain any of the Substances of Very High Concern (SVHC), nor are any of the SVHC's intended to be released during use. As a result, the corrugated packaging converted by Badger Packaging Corporation is not subject to the registration requirements of REACH, Section 7(1).

However, it should also be pointed out that the corrugated industry as a whole continues to integrate more Old Corrugated Containers (OCC) into the sheets used in the converting process, with many providing sheets that are 100 percent OCC. Even though SVHC are not added through our suppliers, there is no guarantee that the OCC has not been exposed to contaminants through the recycling stream.

This potential exposure does not infer SVHC in concentrations greater than .01 percent are contained in any of the sheets supplied to Badger Packaging. On the contrary, our sheet suppliers, one of which who only supplies sheets made from 100 percent recovered OCC, have stated their sheets do not contain any SVHC chemical listed at levels greater than .01 percent or 1000ppm.

In an effort to provide additional assurance and transparency to our customers, below are statements of REACH compliance from vendors who supply the materials used in our converting process.

Sincerely,

A handwritten signature in purple ink that reads "Todd Tillmann".

Todd Tillmann  
Customer Service Supervisor

March 22, 2011

Badger Packaging Corporation

Dear Bonnie,

In response to your inquiry pertaining to how Smurfit-Stone packaging products are impacted by the European Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (“REACH”), I am providing the following information.

REACH is an extensive regulation that covers any substance, preparation or article manufactured in or imported into the European community. The actions which must be taken under REACH are specific to the category, (substance, preparation or article) under which the product falls. Smurfit-Stone corrugated containers and paperboard are articles as defined by Article 3(3) of REACH and as clarified in the “Guidance on Requirements for Substances in Articles” Appendix 3(4)<sup>1</sup>.

Smurfit-Stone corrugated containers and paperboard do not contain chemicals intended to be released during the use of the paper or container and as a result are not subject to the registration requirements of REACH section 7(1).

Companies that produce articles that contain chemicals on the list of “Substances of Very High Concern” (“SVHC”) at levels of 0.1% are required to notify customers of the presence of these chemicals.

Smurfit-Stone has reviewed the chemicals listed as of March 30, 2010 on the Candidate List of Substances of Very High Concern for Authorisation. Smurfit-Stone products do not contain any of the chemicals on the March 30 list at levels greater than 0.1%.

Smurfit-Stone will continue to monitor European Community action which would list any of the proposed SVHC chemicals in Annexes XIV or XVII of REACH and subject them to authorization or restriction requirements. Smurfit-Stone will take appropriate actions required by REACH based on those listings.

If you have any additional questions or concerns, please contact Wayne Huttle, Director, Environmental Support Programs at 314-656-5365 or [whuttle@smurfit.com](mailto:whuttle@smurfit.com).

Regards,

**Dave Walling**

Quality / Process Manager

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<sup>1</sup> “Guidance on requirements for Substances in Articles”, Guidance for the Implementation of REACH, European Chemical Agency, May 2008



**Pratt Industries**  
Corrugating Division

Ms Bonnie Egerer  
Badger Packaging Corp  
2035 Stonebridge Road  
West Bend, WI 53095

March 17, 2011

Dear Ms Egerer:

You requested information on our compliance with the European Union's R.E.A.C.H. requirements. The R.E.A.C.H. requirements concern chemicals that are particularly harmful to humans. A list of these chemicals is titled Substances of Very High Concerns (SVHC)

We do not test for the presence of these chemicals in our recycled boxes. However with our knowledge of the paper making process, and a search of our MSDSs, we can assure you that none of them are present in our recycled product at a level of 1,000 ppm or above.

If you have any question please feel free to contact me.

Sincerely

A handwritten signature in cursive script that reads "Donald S. Fork".

Donald Fork  
Safety/Environmental Manager  
Pratt Industries (USA)  
Tele 219-548-9191  
dfork@prattindustries.com



Jeff Orr  
EHS Product Steward  
630-382-1868 Direct Phone  
847-517-1652 FAX  
Jeff.Orr@inxintl.com

INX International Ink Co.  
Corporate Offices  
Environment, Health and Safety  
150 N. Martingale Suite 700  
Schaumburg, IL 60173  
630-382-1800 x1450 EHS  
MSDS@inxintl.com

June 10, 2010

BADGER PACKAGING CORPORATION  
2035 STONEBRIDGE ROAD  
WEST BEND, WI, 53095

RE: REACH Substances of Very High Concern (SVHC)

The following is in response to your recent inquiry and is applicable to products listed in Appendix A.

INX International Ink Co. has reviewed readily available formulary information and internal health and safety databases to determine that the ink products supplied below are not manufactured with, nor would be expected to contain the following:

Chemical Name	CAS Registry Number
Anthracene	120-12-7
4,4'-Diaminodiphenylmethane	101-77-9
Dibutyl phthalate	84-74-2
Cyclododecane	294-62-2
Cobalt dichloride	7646-79-9
Diarsenic pentaoxide	1303-28-2
Diarsenic trioxide	1327-53-3
Sodium dichromate, dihydrate	7789-12-0
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7
Hexabromocyclododecane (HBCDD)	25637-99-4
Alpha-hexabromocyclododecane	134237-50-6
Beta-hexabromocyclododecane	134237-51-7
Gamma-hexabromocyclododecane	134237-52-8
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8
Bis(tributyltin)oxide	56-35-9
Lead hydrogen arsenate	7784-40-9
Triethyl arsenate	15606-95-8
Benzyl butyl phthalate	85-68-7
Anthracene oil	90640-80-5
Anthracene oil, anthracene paste, distn. Lights	91995-17-4
Anthracene oil, anthracene paste, anthracene fraction	91995-15-2
Anthracene oil, anthracene-low	90640-82-7
Anthracene oil, anthracene paste	90640-81-6

Pitch, coal tar, high temp.	65996-93-2
2,4-Dinitrotoluene	121-14-2
Diisobutyl phthalate	84-69-5
Lead chromate	7758-97-6
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	12656-85-8
Lead sulfochromate yellow (C.I. Pigment Yellow 34)	1344-37-2
tris(2-chloroethyl)phosphate	115-96-8
Sodium dichromate	7789-12-0 & 10588-01-9
Aluminosilicate Refractory Ceramic Fibres	
Zirconia Aluminosilicate, Refractory Ceramic Fibres	

This certification releases INX International Ink Co. from any liability once the product is removed from its original packaging or handled in any manner that alters its original condition as supplied. Please contact me at 630-382-1868 if you have any questions with regard to this information.

Sincerely,  
 Jeff Orr  
 EHS Product Steward

**Appendix A: List of items reviewed**

INX Code	Product name
1013085	STARBRITE SUPER OPAQUE WHITE
1014430	RESOLV/REFRESHENER
1015104	HY-STAR GCM I 90 BLACK
1015454	FLEXO TRISTAR PANTONE(R) REFLE
1015629	STARFLEX GCM I 609 MAROON
1015631	STARFLEX GCM I 73 RED
1016130	TRISTAR GCM I 10 YELLOW
1016131	TRISTAR GCM I 103 YELLOW
1016137	TRISTAR GCM I 2081 GREEN
1016145	TRISTAR GCM I 24 GREEN
1016148	TRISTAR GCM I 25 GREEN
1016151	TRISTAR GCM I 29 GREEN
1016164	TRISTAR GCM I 3086 BLUE
1016168	TRISTAR GCM I 31 BLUE
1016171	TRISTAR GCM I 32 BLUE

1016177 TRISTAR GCM1 33 BLUE  
1016183 TRISTAR GCM1 388 BLUE  
1016187 TRISTAR GCM1 39 BLUE  
1016199 TRISTAR GCM1 553 BROWN  
1016202 TRISTAR GCM1 74 RED  
1016203 TRISTAR GCM1 75 RED  
1016204 TRISTAR GCM1 76 RED  
1016205 TRISTAR GCM1 80 ORANGE  
1016236 TRISTAR GCM1 91 WHITE  
1016382 FLEXO PMS 200U RED  
1016484 TRISTAR PMS 279U BLUE  
1016514 T/S PMS 2945U BLUE  
1016573 FLEXO PMS 3282U GREEN  
1053148 FLEXO TRISTAR PANTONE® 328U GREEN  
1053167 FLEXO TRISTAR PANTONE(R) 300U  
1053217 FLEXO TRISTAR PANTONE(R) 072U  
1053320 FLEXO FD PANTONE® 293U BLUE  
1053344 FLEXO TRISTAR PANTONE (R) 267-  
1053395 FLEXO STARFLEX PANTONE(R) 433U  
1053651 FLEXO TRISTAR GCM1 30 BLUE  
1063280 FLEXO PMS 278U BLUE  
1112272 FLEXO TRISTAR PANTONE® 287-U BLUE  
1116098 FLEXO TRISTAR PANTONE(R) 356-U GREEN  
1140850 FLEXO TRISTAR PANTONE® 5463 BLUE  
1140863 FLEXO TRISTAR PANTONE® 5425 BLUE  
1142785 FLEXO TRISTAR PANTONE® 341-U GREEN  
1152734 FLEXO TRISTAR PANTONE® 285-U BLUE  
1161770 FLEXO TRISTAR PANTONE® 1807-U MAROON  
1215252 FLEXO TRISTAR COOL GRAY 4-U  
1306225 FLEXO PMS 7462U BLUE  
1137597 FLEXO PMS 2603C PURPLE  
1016654 FLEXO PMS 431U GRAY  
1333337 FLEXO PMS 165 C ORANGE  
1183407 FLEXO TRISTAR PANTONE® 368-U GREEN  
1202338 FLEXO TRISTAR MUELLER RED  
1225096 FLEXO PMS COOL GRAY 10U  
1340895 FLEXO PMS 651 U VIOLET  
1053163 FLEXO STARFLEX PANTONE (R) PRO BLUE  
1011934 FLEXO PMS WARM RED U



INX International Ink Co.

1370002 FLEXO PMS 5747U GREEN  
1252286 FLEXO PMS 5747u GREEN  
1074107 FLEXO TRISTAR PANTONE(R) 347U GREEN

March 4, 2011



**H.B. Fuller**

**H.B. Fuller Company**

1200 Willow Lake Boulevard  
P.O. Box 64683  
St. Paul, Minnesota 55164-0683 USA  
(651) 236-5900

**email**

Pages: \_\_\_\_1\_\_\_\_

Ms. Jennifer Larson  
Chicago Glue Machine & Supply Company

Regarding ECHA Annex XIV SVHC Compliance

Dear Ms. Larson,

In recognition of the wide-ranging impact REACH will have across our business, HB Fuller has established a multi-functional project team to handle both strategic and day-to-day management of the changes that must be made to ensure compliance with this new legislation.

We have an understanding of how the new law will impact our products, raw materials, suppliers, customers and internal departments.

We do not intentionally use substances of very high concern (SVHCs), as identified in the current candidate list published by ECHA, in the manufacturing of this product. Furthermore, we would not anticipate the SVHCs would be present as unintentional impurities or byproducts. This statement is based on information provided by our raw material suppliers.

Products **3715EN** has been researched at the CAS number letter and has been found to be SVHC-free.

Yours sincerely,

H.B. Fuller Company

Brad Brunner  
Global Regulatory



Tom Rolando  
Vice President of Technology  
Wisdom Adhesives  
(847) 841-7002  
tomrolando@wisdomadhesives.com

03/02/2011

Badger Packaging  
2035 Stonebridge Road  
West Bend, WI 53095

Dear Customer:

Thank you for your continued business and interest in Wisdom Adhesives products and services. Per your recent request regarding any substances of very high concern (SVHC) requiring authorization -as defined in EU REACH legislation- in the products listed below, the following information is presented:

**PRODUCTS**

**R335SF**

**SVHC**

**None**

The above products do not contain SVHC as intended by the product formulation, raw materials used to produce the product, nor the processes used in making the formulation and therefore are REACH compliant as determined to the best of our ability using internal and vendor data and documentation.

Please feel free to contact us for any additional information.

Thank you.

Best Regards,

Tom Rolando  
Wisdom Adhesives  
(847) 841-7002  
tomrolando@wisdomadhesives.com



SUBJECT: The European Union and "REACH"

DATE: March 10, 2011

The European Union (EU) is in the process of implementing a new chemical regulatory policy called REACH. The term "REACH" [Registration Evaluation and Authorization of Chemicals] is a registration and reporting procedure for all chemical substances imported, manufactured or used in the EU above 1 metric ton per year, as well as highly regulated chemicals, referred to as "SVHC" Substances of Very High Concern. This new regulatory policy is being phased in starting with pre-registration in 2008. The deadline for the pre-registration phase was December 1, 2008.

All chemical substances which have been identified as requiring registration by Henkel Adhesive Technologies have been submitted for pre-registration to The European Chemical Agency (ECHA). Respective confirmation has been sent by ECHA. There is no obligation according to REACH to publish pre-registration numbers.

The actual REACH regulation regarding the reporting of usage is being phased in over a number of years beginning in 2010.

The purpose of this communication is to assist you with some basic information about REACH compliance and the presence, if any, of SVHC substances in the product(s) you purchase from Henkel.

### **REACH with regard to our North American Customers**

- a. Completed Articles: REACH does not apply to your customer's manufactured products. Example; Your customer uses Henkel adhesive or sealant products to manufacture a widget in North America. REACH classifies this as a "completed article". Completed articles are not regulated by REACH.
- b. Henkel Products Purchased In Europe: Henkel has pre-registered all of the chemical ingredients sold by Henkel in Europe to authorized distributors and customers physically located in the EU. Customers in the EU who buy from a Henkel or authorized Henkel distributor located in the EU do not have to register any Henkel products.
- c. Henkel Products Imported Into Europe: Importers physically located in the EU are required to pre-register the chemicals they import with REACH independent of any pre-registration Henkel may have completed. It is the importer site located in the EU which is responsible for pre-registering chemical products they buy from outside the EU. North American distributors cannot perform this function for their customer.
- d. How Can You Obtain More Information About Registering: You should contact an "Only Representative" commonly referred to as an "OR". These companies have offices in North America and in the EU. They can provide more information to you. We strongly recommend that you or your subsidiaries or customers in the EU utilize the services of an only representative. Henkel will work directly with them to ensure that volumes of chemicals imported are properly tracked and that the proper notifications are made if necessary.



## Formula Disclosure

As previously stated, REACH requires a company in the EU which imports chemical products to pre-register the chemical ingredients, even though Henkel has already registered them. To accomplish this they must have access to proprietary formula information.

Henkel North America will only disclose formula information to customers of record (or their Only Representatives) who sign a non-disclosure agreement.

**NOTE:** Henkel North America's formulation disclosure policy explicitly excludes distributors from receiving formulation information even if they offer to sign a non-disclosure agreement.

## Substances of Very High Concern (SVHC) Chemicals

REACH Annex XIV is the Candidate List of Substances of Very High Concern (SVHC) that was published by the ECHA on August 30, 2010. Use of Substances on the Candidate List will likely be highly restricted in the EU. The substances on this list are as follows:

Substance name	CAS number	EC number
Anthracene	120-12-7	204-371-1
4,4'- Diaminodiphenylmethane	101-77-9	202-974-4
Dibutyl phthalate	84-74-2	201-557-4
Cobalt dichloride	7646-79-9	231-589-4
Diarsenic pentaoxide	1303-28-2	215-116-9
Diarsenic trioxide	1327-53-3	215-481-4
Sodium dichromate	7789-12-0 10588-01-9	234-190-3
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	201-329-4
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-0
Hexabromocyclododecane (HBCDD)	25637-99-4 3194-55-6 (134237-51-7 134237-50-6 134237-52-8)	247-148-4, 221-695-9
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8	287-476-5
Bis(tributyltin)oxide	56-35-9	200-268-0
Lead hydrogen arsenate	7784-40-9	232-064-2
Triethyl arsenate	15606-95-8	427-700-2
Benzyl butyl phthalate	85-68-7	201-622-7
Anthracene oil	90640-80-5	292-602-7
Anthracene oil, anthracene paste, distn. Lights	91995-17-4	295-278-5
Anthracene oil, anthracene paste, anthracene fraction	91995-15-2	295-275-9
Anthracene oil, anthracene-low	90640-82-7	292-604-8
Anthracene oil, anthracene paste	90640-81-6	292-603-2
Pitch, coal tar, high temp.	65996-93-2	266-028-2



<p>Aluminosilicate Refractory Ceramic Fibres</p> <p>Aluminosilicate Refractory Ceramic Fibres are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008, and fulfil the two following conditions:</p> <p>a) Al<sub>2</sub>O<sub>3</sub> and SiO<sub>2</sub> are present within the following concentration ranges:</p> <ul style="list-style-type: none"> <li>• Al<sub>2</sub>O<sub>3</sub>: 43.5 – 47 % w/w, and SiO<sub>2</sub>: 49.5 – 53.5 % w/w,</li> <li>or</li> <li>• Al<sub>2</sub>O<sub>3</sub>: 45.5 – 50.5 % w/w, and SiO<sub>2</sub>: 48.5 – 54 % w/w,</li> </ul> <p>b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometers (µm).</p>	-	-
<p>Zirconia Aluminosilicate Refractory Ceramic Fibres</p> <p>Zirconia Aluminosilicate Refractory Ceramic Fibres are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008, and fulfil the two following conditions:</p> <p>a) Al<sub>2</sub>O<sub>3</sub>, SiO<sub>2</sub> and ZrO<sub>2</sub> are present within the following concentration ranges:</p> <ul style="list-style-type: none"> <li>• Al<sub>2</sub>O<sub>3</sub>: 35 – 36 % w/w, and</li> <li>• SiO<sub>2</sub>: 47.5 – 50 % w/w, and</li> <li>• ZrO<sub>2</sub>: 15 - 17 % w/w,</li> </ul> <p>b) fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometers (µm).</p>	-	-
2,4-Dinitrotoluene	121-14-2	204-450-0
Diisobutyl phthalate	84-69-5	201-553-2
Lead chromate	7758-97-6	231-846-0
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	12656-85-8	231-846-0
Lead sulfochromate yellow (C.I. Pigment Yellow 34)	1344-37-2	231-846-0
Tris(2-chloroethyl)phosphate	115-96-8	204-118-5
Acrylamide	79-06-1	201-173-7
Ammonium dichromate	7789-09-5	232-143-1
Boric acid	10043-35-3, 11113-50-1	233-139-2 / 234-343-4
Disodium tetraborate, anhydrous	1303-96-4, 12179-04-3	215-540-4
Potassium chromate	7789-00-6	232-140-5
Potassium dichromate	7778-50-9	231-906-6
Sodium chromate	7775-11-3	231-889-5
Tetraboron disodium heptaoxide, hydrate	12267-73-1	235-541-3
Trichloroethylene	79-01-6	201-167-4
Cobalt(II) sulphate	10124-43-3	233-334-2
Cobalt(II) dinitrate	10141-05-6	233-402-1
Cobalt(II) carbonate	513-79-1	208-169-4
Cobalt(II) diacetate	71-48-7	200-755-8



2-Methoxyethanol	109-86-4	203-713-7
2-Ethoxyethanol	110-80-5	203-804-1
1,2,3-Trichlorobenzene	87-61-6	201-757-1
1,2,4-Trichlorobenzene	120-82-1	204-428-0
1,3,5-Trichlorobenzene	108-70-3	203-608-6
Chromium trioxide	1333-82-0	215-607-8
Acids generated from chromium trioxide and their oligomers:		
Chromic acid	7738-94-5	231-801-5
Dichromic acid	13530-68-2	236-881-5
Oligomers of chromic acid and dichromic acid	-	-

This will certify that to the best of our knowledge, the chemicals listed above are not intentionally added or present in the following products at a concentration of 0.1% or greater:

#### ADHESIN 33-070A

Please keep in mind that the information being provided regarding the substances contained in these products comes from reviewing information provided by suppliers or producers of the raw materials used in the above products. We have not conducted any tests to determine the presence of these substances in the above products.

In the event that more information is required, we would suggest that appropriate analytical testing be conducted, as we are unable to provide any additional data ourselves. This proprietary information is considered business-sensitive and should only be used for environmental, health, and safety purposes. Please feel free to contact your local sales representative with any additional questions.

Kind Regards,

Jennifer Altman

March 23, 2011

Spec Tape of Wisconsin

Attn: Dennis

Email: sales2@spectapewi.com

Re: REACH – Intertape #281 (K2664)

REACH (EC No. 1907/2006) is a European regulation governing chemicals and materials sold within the European Union. REACH stands for Registration, Evaluation, and Authorization of Chemicals.

- The subject Intertape product is defined under REACH as an ‘Article’. Articles are subject to notification if they contain any substance on the Candidate List of Substances of Very High Concern (SVHC) above a threshold of 0.1% by weight.
- *The subject Intertape product meets these restrictions, does not contain substances above these limits per MSDS review.*
- The current Candidate List of SVHC (attached) was last updated by ECHA on December 15, 2010.

Intertape policy promotes responsible stewardship of product and environmental safety, both in the workplace and in our worldwide community. Please contact us if you have further questions.

Sincerely,



Kevin Banker  
Technical Service Manager  
810.941.6389 ph  
810.364.4289 fax  
kbanker@itape.com

## ECHA REACH Candidate List of Substances of Very High Concern for authorization

Substance Name	EC Number	Inclusion Date
2,4-Dinitrotoluene	204-450-0	13.01.2010
2-Ethoxyethanol	203-804-1	15.12.2010
2-Methoxyethanol	203-713-7	15.12.2010
4,4'- Diaminodiphenylmethane (MDA)	202-974-4	28.10.2008
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	201-329-4	28.10.2008
Acrylamide	201-173-7	30.03.2010
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	287-476-5	28.10.2008
Aluminosilicate Refractory Ceramic Fibres <i>are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the two following conditions:</i> a) $Al_2O_3$ and $SiO_2$ are present within the following concentration ranges: <ul style="list-style-type: none"> <li>• <math>Al_2O_3</math>: 43.5 – 47 % w/w, and <math>SiO_2</math>: 49.5 – 53.5 % w/w,</li> </ul> or <ul style="list-style-type: none"> <li>• <math>Al_2O_3</math>: 45.5 – 50.5 % w/w, and <math>SiO_2</math>: 48.5 – 54 % w/w,</li> </ul> b) <i>fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (<math>\mu m</math>).</i>	-----	13.01.2010
Ammonium dichromate	232-143-1	18.06.2010
Anthracene	204-371-1	28.10.2008
Anthracene oil	292-602-7	13.01.2010
Anthracene oil, anthracene paste	292-603-2	13.01.2010
Anthracene oil, anthracene paste, anthracene fraction	295-275-9	13.01.2010
Anthracene oil, anthracene paste, distn. lights	295-278-5	13.01.2010
Anthracene oil, anthracene-low	292-604-8	13.01.2010
Benzyl butyl phthalate (BBP)	201-622-7	28.10.2008
Bis (2-ethylhexyl)phthalate (DEHP)	204-211-0	28.10.2008
Bis(tributyltin)oxide (TBTO)	200-268-0	28.10.2008
Boric acid	233-139-2 and 234-343-4	18.06.2010
Chromic acid, Oligomers of chromic acid and dichromic acid, Dichromic acid	231-801-5 and 236-881-5	15.12.2010
Chromium trioxide	215-607-8	15.12.2010
Cobalt dichloride	231-589-4	28.10.2008
Cobalt(II) carbonate	208-169-4	15.12.2010
Cobalt(II) diacetate	200-755-8	15.12.2010
Cobalt(II) dinitrate	233-402-1	15.12.2010
Cobalt(II) sulphate	233-334-2	15.12.2010



Diarsenic pentaoxide	215-116-9	28.10.2008
Diarsenic trioxide	215-481-4	28.10.2008
Dibutyl phthalate (DBP)	201-557-4	28.10.2008
Diisobutyl phthalate	201-553-2	13.01.2010
Disodium tetraborate, anhydrous	215-540-4	18.06.2010
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified:  Alpha-hexabromocyclododecane Beta-hexabromocyclododecane Gamma-hexabromocyclododecane	247-148-4 and 221-695-9 (134237-50-6) (134237-51-7) (134237-52-8)	28.10.2008
Lead chromate	231-846-0	13.01.2010
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)	235-759-9	13.01.2010
Lead hydrogen arsenate	232-064-2	28.10.2008
Lead sulfochromate yellow (C.I. Pigment Yellow 34)	215-693-7	13.01.2010
Pitch, coal tar, high temp.	266-028-2	13.01.2010
Potassium chromate	232-140-5	18.06.2010
Potassium dichromate	231-906-6	18.06.2010
Sodium chromate	231-889-5	18.06.2010
Sodium dichromate	234-190-3 (7789-12-0 and 10588-01-9)	28.10.2008
Tetraboron disodium heptaoxide, hydrate	235-541-3	18.06.2010
Trichloroethylene	201-167-4	18.06.2010
Triethyl arsenate	427-700-2	28.10.2008
Tris(2-chloroethyl)phosphate	204-118-5	13.01.2010
Zirconia Aluminosilicate Refractory Ceramic Fibres <i>are fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.2 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the two following conditions:</i> a) $Al_2O_3$ , $SiO_2$ and $ZrO_2$ are present within the following concentration ranges: <ul style="list-style-type: none"><li>• <math>Al_2O_3</math>: 35 – 36 % w/w, and</li><li>• <math>SiO_2</math>: 47.5 – 50 % w/w, and</li><li>• <math>ZrO_2</math>: 15 - 17 % w/w,</li></ul> b) <i>fibres have a length weighted geometric mean diameter less two standard geometric errors of 6 or less micrometres (<math>\mu m</math>).</i>	-----	13.01.2010
1) The substance does not meet the criteria for identification as a carcinogen in situations where it contains less than 0.005 % (w/w) benzo[a]pyrene (EINECS No 200-028-5) 2) The substance does not meet the criteria for identification as a carcinogen in situations where it contains less than 0.005 % (w/w) benzo[a]pyrene (EINECS No 200-028-5) and less than 0,1 % w/w benzene (EINECS No 200-753-7).] 3) The substance does not meet the criteria for identification as a mutagen in situations where it contains less than 0,1 % w/w benzene (EINECS No 200-753-7).]		

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**SIGNODE PACKAGING SYSTEMS**

**Product Safety Department**  
3640 West Lake Avenue  
Glenview, Illinois 60026  
Phone: (847) 657-4498/4824  
Fax: (847) 657-5181  
Web Site: www.signode.com



*An ITW Company*

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March 7, 2011

Ms. Jeannie Pipkorn  
Badger Packaging Corporation  
2035 Stonebridge Road  
West Bend, WI 53095

**SUBJECT: European Union REACH Program Substances of Very High Concern (SVHC)**

Dear Ms. Pipkorn:

ITW Signode Packaging Systems has reviewed your request regarding the compliance of our 1716 LC Tenax Green 24C 1/2", and LD-213 Clear Contrax 2X1602 1/4" Plastic Strapping products with the REACH Directive.

Based on information provided by our raw material suppliers, no SVHC (Substances of Very High Concern) as listed in the current REACH Candidate List, are intentionally present in our products.

Sincerely,

A handwritten signature in black ink that reads 'Michael J. Brown'.

Michael J. Brown  
Product Safety Engineer

MJB:lnd  
cc: Cynthia Conte