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## EUROPEAN REGULATION CONCERNING SUBSTANCES WITH VERY HIGH CONCERN (REACH/SVHC)

GCR is pleased to announce that it has made all necessary actions to comply with this regulation, as well aware of Reach 1907/2006.

Granic products are manufactured with registered raw materials. Our suppliers are committed to comply in every respect to the requirements of Reach and relevant amendments. So, we make sure that they have registered their products. In consequence, we guarantee the absolute continuity of the above product supply.

Furthermore, this product does not contain, to our current knowledge and according with our raw material certificates, any substances listed in "Candidate List" above 0,1%: (<https://echa.europa.eu/candidate-list-table>).

## EC-PACKAGING DIRECTIVE AND CONEG (Coalition of Northeastern Governors – USA)

Based on the available documentation from raw materials suppliers, GCR confirms that this product complies with the European Parliament and Council Directive [94/62/EC of the 20/12/1994 and applicable amendments](#) concerning the defined limit(s) of heavy metals like lead, cadmium, mercury and chromium (VI).

Furthermore, GCR Group informs that this product complies with Coalition of Northeastern Governors (CONEG) as the Sum of heavy metals (Cadmium, Lead, chrome and mercury) is <100 ppm.

## NANOPARTICLES

Nanoparticles with a diameter below 100 nanometers are not intentionally introduced in the manufacturing of the product above mentioned, so their presence in this product is not expected.

However, since we do not perform specific tests to verify the potential presence of nanoparticles in our product, we cannot guarantee that there is no trace amount of some of nanoparticles as impurity or otherwise in this Granic product.

## ABSENCE OF PARABENS

This product, to the best of our knowledge, is not intentionally manufactured or formulated with parabens, so is not expected to be present in our product.

However, since we do not systematically perform specific test to verify the potential presence of these substances in our product, we cannot guarantee that there is no trace amount of these substances, as impurity or otherwise, in the above-mentioned product.



### ABSENCE OF ALKYL PHENOLS

Alky phenols are not used in our manufacturing process.

However, some of our suppliers inform us that one or more of the stabilizers used in the antioxidant package of some of our raw materials is or are in a broader sense alkyl phenols. However, they do not belong to the group of estrogen mimicks specified e.g. by the Japanese Authorities.

Some components of the antioxidant package used in these raw materials are either sterically hindered phenols or derived from sterically hindered phenols, e.g. phenols which are substituted in positions 2 and 6 or 2 and 4, with respect to the hydroxyl group.

Such compounds are known to lack estrogenic activity in contrast to alkylphenols such as 4-alkylphenols.

### FOOD ALLERGENS

According to the suppliers, the food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of the raw materials belonging to this product. However, this product has not been tested for these substances.

### GENETICALLY MODIFIED ORGANISMS

All raw materials used to manufacture this product have been certified as no Genetically Modified Organisms (GMO).

This information is given in good faith based on available sources at the time of issuing.

### EU-Directive 2011/65/EU the restriction of the use of certain hazardous substances (RoHS)

According to certificates from our suppliers, GCR informs you, that the above-mentioned product complies with the requirements of the **Directive 2011/65/EU**, as amended, concerning the limits of the following substances referred to in Article 4 (part 1) and maximum concentration values tolerated by weight in homogeneous materials.

Substances	Limits
Cadmium (Cd)	0.01%
Lead (Pb)	0.1%
Mercury (Hg)	0.1%
Hexavalent Chromium (Cr VI)	0.1%
Polybrominated Biphenyls (PBB)	0.1%
Polybrominated Diphenyl Ethers (PBDE)	0.1%
Bis(2-Ethylhexyl) phthalate (DEHP)	0.1%
Benzyl butyl phthalate (BBP)	0.1%
Dibutyl phthalate (BBP)	0.1%
Diisobutyl phthalate (DIBP)	0.1%



## SAFETY OF TOYS

GCR informs you, according to our suppliers, that the above-mentioned product is in compliance with the Directive **2009/48/EC** of 18 June 2009 on the safety of toys and subsequent amendments.

This text doesn't apply to our product nevertheless according to our suppliers and the annex II part III - chemical properties, our product:

- Is not a hazardous substance or mixture according to the Regulation 1272/2008/EC (CLP)
- Is not a CMR of category 1A, 1B or 2 under CLP
- Neither nitrosamines nor nitro sable substances are intentionally added
- No allergenic fragrance listed in the point 11 of annex II are intentionally added

Concerning Nitrosamine, nitro sable substances and allergenic fragrance: the above Granic product has not been tested for these chemical substances as they are not expected to be present in our product.

## Standard EN 71, Part 3: Soluble elements: migration of certain elements

In agreement with our suppliers and in compliance with the point 13 of annex III and the European standard **EN 71, Part 3: Migration of certain elements**, heavy metal compounds are natural impurities of the mineral content in the above mentioned Granic product. They are not added as intentional ingredients in our product.

According to certificates from our suppliers, (trace elements of the HCL / HNO<sub>3</sub> soluble part) done for some elements show results below the limits mentioned in the Category III - in scraped of toy material but not all listed elements have been analyzed (aluminum, boron, chrome III and VI, organic tin).

Please note that the thresholds of migration limits listed in the EN71-3 concerns the toys material or components of toys, not the single product stated above. Since we do not produce the final product, this statement does not remove the obligation of the manufacturer to evaluate/test the toy material or toy components under the above-mentioned standard.

## VOLATILE ORGANIC COMPOUNDS

The content in VOC of above-mentioned product is < 3% (mass).

Therefore, this product is exempted from the tax of incentive on the VOC according to the Federal Department of the Swiss Finances DFF.

This evaluation is based on information provided by our suppliers in reference to the presence of volatile organic compounds. Therefore, we do not perform specific tests to verify this.



## ANIMAL DERIVED COMPONENTS

According to certificates from our suppliers, GCR informs you, that some additive(s)/substance(s), of above-mentioned product can be synthesized from animal and/or vegetable extracts.

These substances comply with the requirements specified in the “Note for Guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products” (EMA/410/01 Rev.3 – July 1, 2011), adopted by the European Commission and published in the Official Journal of the European Union March 5, 2011 (2011/C 73/01).

Furthermore, only Category 3 materials or equivalent as defined by Article 10 of European Parliament and Council Regulation (EC) No 1069/2009 are used for these substances and therefore are considered compliant with the EMA Note for Guidance referenced above.

## CONFLICT MINERALS (Dodd-Frank Wall Street Reform and Consumer Protection Act)

This product, to the best of our knowledge, is not intentionally manufactured or formulated with conflict minerals (tin, tungsten, tantalum and gold) as they are defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Furthermore, none of the raw materials belonging to this product have been imported from the Democratic Republic of the Congo (DRC) or adjoining countries as Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

## JAPAN MHLW

GCR informs you, according to the published lists under the Food Sanitation Act, Article 18, Section 3, that the components of the above-mentioned product (if applicable) are according to:

Positive List (PL) in Japan

- The polymeric part in the above-mentioned product is listed in the Positive List of Base Polymers. (Appendix 1, Table 1 of the "Standards for the utensils or containers and packaging or the raw materials, amended on June 1st. 2025 under Food Sanitation Act, Article 18, Section 3).
- The dosage(s) of additive(s) are below the maximum level of use specified in the Positive List of the additives, (Appendix 1, Table 2 of the "Standards for the utensils or containers and packaging or the raw materials, amended on June 1st. 2025 under Food Sanitation Act, Article 18, Section 3)

Please note that any inorganic additives and fillers have been removed from the positive list as of June the 1st. 2025.



Furthermore, the polymeric part of the above-mentioned product (through the CAS number) might have additional limitations to use as the food contact material under the announcement below (please refer to the "Information of Limitation to Use" below).

o Information of Limitation to Use:

Food types					Maximum temperature	Group	Remarks
Acidic	Oily and fatty	Milk and milk product	Alcoholic beverage	Others	I. ≤70°C II. ≤100°C III. ≥101°C		
o	o	o	o	o	III	2, 5	*

- \*1-アルケンは1種類以上使用することができる。  
 1-アルケンが基ポリマー構成成分に対して50%未満であること。  
 C=11以上の1-アルケンが基ポリマー構成成分に対して10%以下であること。  
 • One or more kinds of 1-alkene can be used.  
 • 1-Alkene: Less than 50% in the base polymer components.  
 • 1-Alkene with C11 or more: Not more than 10% in the base polymer components.

This information is provided for informational purposes only and does not exempt the manufacturer from testing the final product in accordance with applicable regulations, especially regarding food contact. To the best of our knowledge, the information shared here is accurate and reliable based on the available sources, but it is the user's responsibility to assess its suitability. We cannot accept liability for any outcomes resulting from its use.

## MICROPLASTICS

GCR informs you that, in relation to the compliance of the above mentioned product, the following can be declared:

According to Regulation (EU) 2023/2055 amending Annex XVII to Regulation (EC) No 1907/2006 (REACH) concerning synthetic polymer microparticles, this product is supplied in pellet form with a particle size between 2 and 5 mm. While it may technically fall under the definition of a synthetic polymer microparticle, the above mentioned product:

- Is not intended for intentional release into the environment.
- Is exclusively intended for use at industrial sites.
- Is handled under controlled conditions, in line with good manufacturing practices (GMP).

Therefore, pursuant to paragraph 4(a) of entry 78 of Annex XVII of the REACH Regulation, the product is exempt from the restriction set out in paragraph 1, provided it is used in accordance with its intended industrial purpose.

Additionally, in accordance with paragraph 7, industrial users are informed of their obligation to implement appropriate measures to prevent environmental release during use. In compliance with paragraph 8, GCR provides users with the necessary information to ensure safe and compliant use of the product.



Furthermore, GCR is adhering to the Operation Clean Sweep, which is a global initiative aimed at preventing plastic pellet, flakes, and powder loss to the environment.

### ABSENCE OF SUBSTANCES

This product, according to our suppliers and to the best of our knowledge, is not intentionally manufactured or formulated with the following substances:

- **BENZOPHENONE DERIVATIVES** We mean the following substances by benzophenone derivatives:
  - Benzophenone (CAS No 119-61-9)
  - 2-hydroxybenzophenone (CAS No 117-99-7)
  - 3-hydroxybenzophenone (CAS No 13020-57-0)
  - 4-hydroxybenzophenone (CAS No 1137-42-4)
  - 4-methylbenzophenone (CAS No 134-84-9)
- **BIOCIDES** (Regulated by European Parliament and Council Regulation (EU) No 528/2012)
- **BISPHENOL A and BISPHENOL F** (CAS No 80-05-7 and CAS No 620-92-8)
- **BSE/TSE: Bovine Spongiform Encephalopathy / Transmissible Spongiform Encephalopathy.**  
Tallow derivatives are following the **Animal-By Products (EC) 1069/2009 Regulations**
- **NITROSAMINE:** (CAS 35576-91-1)
- **ORGANOTIN COMPOUNDS**
- **PFAS** (Per- and poly-fluoro alkyl substances)
- **PHTHALATES**
- **TNPP [tris(nonyphenyl)phosphite]:** (CAS 26523-78-4)

However, since we do not systematically perform specific test to verify the potential presence of these substances in our products, we cannot guarantee that there is no trace amount of these substances, as impurity or otherwise, in the above-mentioned product.

This document expires one year after the date of issue or if an update occurs sooner.

REGULATORY AFFAIRS DEPARTMENT  
Silvia Larrucea

06/08/2025

