Hubron (International) Limited

Albion Street,
Failsworth, Manchester,
M35 0FP, England

Tel: +44(0)161 681 2691
Fax: +44(0)161 683 4658
E-mail: sales@hubron.com
Web: www.hubron.com

Product Compliance

Black Masterbatch PEB 2050

European Union:

Framework regulation (EC) 1935/2004 and European Commission Regulation (EU) No 10/2011 of 14th January 2011 on plastic materials and articles intended to come into contact with food:

Not compliant.

Black masterbatch PEB 2050 is manufactured using good manufacturing practices as specified by Regulation (EC) No 2023/2006.

REACH Regulation (EC) 1907/2006 & Commission Regulation (EU) No 1272/2013

Raw materials and processes used in the manufacture of PEB 2050 none are listed on the SVHC List issued 7th November 2024 (242 items) above the permissible threshold.

No substances listed in Annex XIV of the above regulation are used in the manufacture of PEB 2050.

No substances listed in Annex XVII of the above regulation are used in the manufacture of PEB 2050 with the exception of Polycyclic Aromatic Hydrocarbons (PAHs) which are encapsulated on the carbon black surface.

Substances used in the manufacture of PEB 2050 do not meet PBT or vPvB criteria under EU REACH Annex XIII. In addition, substances used in the manufacture of PEB 2050 are not classified as endocrine disruptors according to REACH article 57(f) or EU 2017/2100 and 2018/605. However, some Polycyclic Aromatic Hydrocarbons are listed as potential endocrine disruptors for example Benzo(a)pyrene is categorised in Group 3.

Polycyclic Aromatic Hydrocarbons (PAHs) are associated with carbon black and are present in trace levels on the surface of all carbon blacks. Hubron products fully encapsulate the carbon black pigment in a polymer matrix and as such any PAHs present are contained.

Typical total PAH content of carbon black grades used do not generally exceed 0.1% and levels of individual components such as benzo(a)pyrene varies considerable from grade to grade.

Annex XVII of Commission Regulation (EU) No 1272/2013 states that in certain applications where prolonged or short-term repetitive contact with human skin or the oral cavity is likely. The individual PAH content in a component should be lower than 1PPM. For toy applications, this is reduced further to 0.5PPM.

Data obtained by Hubron from the testing of the specific grades of carbon used in PEB 2050 shows that typical individual PAH levels do not exceed 50PPM. This information is based on occasional testing of the carbon black and does not form a specification/guaranteed level.

PEB 2050 **is not** suitable for short term or long repetitive contact to human skin or oral cavity.

Use of Perfluorooctanoic acid PFOA:

I can confirm that Hubron **do not** use PFOA or any related substances (including salts and polymers) in the manufacture of PEB2050.

Persistent Organic Pollutants (EU) 2019/1021

No substances listed in Annex I – IV are used in the manufacture of PEB2050. Annex III states that PAHs should be subject to release reduction provisions.

PAHs are associated with carbon black and are present at trace levels on the surface of carbon black.

Volatile Organic Compounds (VOC)

Hubron Masterbatches do not contain any substances classified as a volatile organic compound as intentionally added substances, as defined in Swiss Ordinance 814.018.

Packaging and Packaging Waste Directive 94/62/EC
Hubron masterbatches as listed below contain pigments with total levels of lead, cadmium, mercury and hexavalent chromium below 100PPM.
The above-mentioned materials are therefore in compliance with Article 11 of the above Directive
The above statement is unaffected by the amending Directives 99/177/EC, 2004/12/EC and 2005/20/EC.

End-of Life Vehicle Directive 2000/53/EC

The above mentioned masterbatches are NOT classified as hazardous as described, under directive (EU) 1272/2013. The above mentioned masterbatch only contains trace amounts of lead, mercury, cadmium and hexavalent chromium (<100PPM) unintentionally present.

Compliance with Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles, and its subsequent amendments 2002/525/EC, 2005/438/EC and 2005/673/EC must be determined by the end user.

2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment:

Annex II of 2011/65/EU lists substances that have maximum permitted concentration values. Black Masterbatch PEB 2050 does **not** contain the substances PBB or PBDE mentioned in Annex II of 2011/65/EU.

The above mentioned masterbatch does contain trace levels of Lead, Mercury, Cadmium and Chromium however, levels of individual substances should not typically exceed those indicated in Annex II of 2011/65/EU.

(EU) 2015/863 amends directive 2011/65/EU by listing a further 4 substances with maximum concentration values that are not to be exceeded. The above mentioned masterbatch does **not** contain any of the 4 substances listed (DEHP, BBP, DBP, DIBP)

Heavy Metal Content

Antimony < 12 ppm	Lead < 12 ppm	Selenium < 6 ppm
Arsenic < 6 ppm	Cadmium < 4 ppm	Nickel < 2 ppm
Barium < 1 ppm	Chromium < 2 ppm	Zinc < 1 ppm
Mercury < 1 ppm		

**Note heavy metal limits based on pure masterbatch, these levels will be further reduced in the final article. Level is in PPM (mg/kg)*
*** Total Chromium*

GADSL

This is to certify that no ingredients used in the manufacture of PEB 2050 are listed in the GADSL Reference List 01/08/2024, except for Polycyclic Aromatic Hydrocarbons (PAH).

The individual PAH content in a component should be less than 1 PPM for any of the PAHs regulated by REACH Annex XVII. Data supplied by the carbon black producers of the specific grades used in PEB 2050 shows that typical

individual PAH levels **COULD** exceed 1PPM. This information is based on occasional testing of the carbon black and does not form a specification/guaranteed level.

Testing and validation should be carried out to ensure the requirements of GADSL are met.

Directive 2012/19/EU Waste Electrical and Electronic Equipment

No substances used in the manufacture of PEB 2050 are listed in Annex VII of 2012/19/EU

Directive 2009/48/EC Safety of Toys & EN71

Not suitable

Conflict Minerals

The ingredients used constitutionally do not contain any derivatives:

- Gold
- Tin
- Tantalum
- Tungsten
- Wolframite
- Cassiterite
- Coltan
- Any other minerals or derivatives determined by the US Secretary of State to be financing conflict in the DRC or adjoining countries as stipulated in Section 1502 of the Dodd-Frank Act.

To clarify these conflict minerals are neither present in the raw materials we use, nor have they been intentionally added during the manufacturing process of the above mentioned masterbatch

North America:

FDA

Not Compliant

CONEG

Hubron masterbatches as listed below contain pigments with total levels of lead, cadmium, mercury and hexavalent chromium below 100PPM. The above is therefore in compliance.

California Proposition List 65 (December 29th, 2023 – Chemicals Known to the State to Cause Cancer or Reproductive Toxicity)

Black Masterbatch PEB 2050 is based on a carbon black pigment which is does not meet the purity requirements laid down in California Proposition List 65.

Toxic Substance Chemical Control Act

The constituents of PEB 2050 are listed on the TCSA active inventory.

I can confirm that PEB 2050 does not contained the following as intentionally added substances:

1. Phenol, Isopropylated Phosphate (PIP (3:1))
2. Decabromodiphenyl Ether (DecaBDE)
3. 2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)
4. Hexachlorobutadiene (HCBD)
5. Pentachlorothiophenol (PCTP)
6. Polychlorinated Biphenyls (PCBs)

Toxics in Packaging Clearinghouse (TPCH)

No intentional introduction of any amount of lead, mercury, cadmium and hexavalent chromium is permissible at 100ppm in the final packaging. I can confirm that any of the above listed metals associated with Hubron products are NIAS.

Additionally, no phthalates, perfluoroalkyl and polyfluoroalkyl are used in the manufacture of Hubron products.

China:

Hygienic Standards for uses of additives in food containers and packaging materials (GB 9685-2016, 4806.6 and 4806.7)

Not compliant.

Others:

International Living Future Red List

Hubron masterbatches do not intentionally contain any substances listed on the ILFRL. Polycyclic aromatic hydrocarbons are present on the surface of carbon black but are encapsulated.

BSE/TSE

The above mentioned masterbatch is based on Polyethylene and contains a carbon black pigment. No additives are intentionally added. Information from suppliers confirms that these products are free from Bovine Spongiform Encephalopathy (BSE) and Transmissible Spongiform Encephalopathy (TSE).

PEB 2050 does not contain in the manufacture or as NIAS:

2-Isopropyl-thioxanthone (ITX)
2-Ethylhexyl-4-dimethylaminobenzoate (EHDAB)
4-hydroxybenzophenone
4-methylbenzophenone
Allergens
Antimony trioxide
Azo-dyes
Benzophenone
Bisphenol A [chemical name: 2,2-bis(4-hydroxyphenyl) propane] (CAS# 80-05-7)
Bisphenol F [4,4-dihydroxydiphenylmethane] (CAS# 620-92-8)
Bisphenol S [4,4-sulphonyldiphenol] (CAS# 80-09-1)
Chloramines
Chlorine
Chlorinated compounds
Cobalt
Dibutylamine
diethanolamine
diethylacetamide (DEA)
Diethylamine
Dimethylamine
Dinitrogen tetroxide (N2O4)
Dinitrogen trioxide (N2O3)
Epoxidized soybean oil (ESBO)
Formaldehyde
Halogens

Halogenated Polymers

HNO2 (Nitrous Acid)

HNO3 (Nitric Acid)

Latex

Melamine

Mineral Oils

Monoethylamine

MOAH

MOSH

N,N-dimethylacetamide (DMA)

N,N-dimethylformamide (DMF)

NaNO2 (Sodium Nitrite)

NH2OH (Hydroxylamine)

Nitrocellulose

Nitrofurazone

Nitrosamines

Nitrosyl halides (e.g. ClNO, BrNO)

N-Methylmorpholine (NMM)

N-Methylpyrrolidine (NMP)

N-Nitrosodiethylamine (NDEA) and N-Nitroso-N-methyl-4-aminobutyric acid (NMBA)

N-Nitrosodimethylamine (NDMA),

N-nitrosodiisopropyloamine (DIPNA) & N-nitrosoethylisopropyloamine (EIPNA).

NO (Nitric Oxide)

Organic nitrites (e.g. t-BuONO)

Ozone

PVC

PVDC

secondary or tertiary amines, quaternary alkyl ammonium salts or alkyl amides

Semicarbazide

Tetra Butyl Ammonium Bromide (TBAB)

Tributylamine (TBA)

Triethylamine

Trimethylamine

For Hubron

……

Mrs B. Gallifant – Product Stewardship

6th January 2025

Hubron (Int) Ltd cannot be held responsible as a masterbatch producer, for the application in which the product is put by the converter/user. Overall and specific migration is another aspect of the commission regulation. This aspect often depends on the end use conditions, and it is the responsibility of the converter/user of the masterbatch to assure migration compliance of the final product for the intended usage conditions.

The information given above is true and accurate at the time given and it is based on documentation provided by raw material suppliers. Hubron holds no responsibility for the compliance of finished components or compounds, as additional processing and the use of other compound ingredients is beyond our control