



Product Compliance

Non-Food Grade Black Masterbatches

Issue Number 1

Dated: 30th May 2025

This compliance document includes information on applicable regulatory information for non-food grade black masterbatches manufactured in Failsworth, Manchester, UK. A complete list of the grades covered in this document is provided in Annex I of this document.

Important Notice

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.

Hubron (International) 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 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 masterbatches listed in Annex I are not suitable for food, drinking water, toy, cosmetic, medical devices, or pharmaceutical applications.

For specific application details please consult the product grade TDS.

For further information, please contact your sales representative.

For Hubron,

Mrs B. Gallifant
Product Stewardship
30th May 2025

HUBRON (International) LTD

www.hubron.com
e-mail sales@hubron.com
T: +44 (0)161 681 2691

Section 1 – Regulatory Compliance Information

Allergens (Regulation (EU) 1169/2011, as amended)

Hubron black masterbatches do not contain any of the 14 allergens, as defined by Regulation (EU) 1169/2011, either as intentionally added substances or as known contaminants in these products.

Animal testing

Hubron do not conduct animal testing as part of our processes or manufacturing of black masterbatches.

BSE (Bovine Spongiform Encephalopathy)/TSE (Transmissible Spongiform Encephalopathy)

Hubron black masterbatches are not derived from animal or human origin products and have not come in contact with such products during the manufacturing process and therefore should not transmit BSE or TSE.

California Prop 65 (California Safe Drinking Water and Toxic Enforcement Act Proposition 65 of 1986)

Hubron black masterbatches are based on a carbon black pigment which is listed. The carbon black is fully encapsulated and is **NOT** airborne or unbound. No other substances listed are present with the exception of trace levels of heavy metals and Polycyclic Aromatic Hydrocarbons (PAHs) where these quantities are within permissible limits. The Proposition 65 List was last updated on January 3rd, 2025.

CLP (Regulation (EC) 1272/2008, as amended)

The labelling and packaging of our masterbatch products is in accordance with Regulation (EC) 1272/2008 (& successive amendments) on the classification, labelling and packaging of substances and mixtures. Please refer to product grade SDS for CLP information.

CMR Substances

None of Hubrons black masterbatches are classified as CMR (carcinogenic, mutagenic or toxic for reproduction) and no substances classified as CMR (to the best of our knowledge), according to Regulation (EC) 1272/2008 (& successive amendments), are intentionally added to masterbatch products.

CONEG (US Coalition of North-Eastern Governors)

Hubron masterbatches as listed in Annex I contain heavy metals with total levels of lead (Pb), cadmium (Cd), mercury (Hg) and hexavalent chromium (CrVI) below 100PPM. The products listed in Annex I are therefore in compliance.

Conflict Minerals

The term "conflict minerals" refers to gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (tantalum, tin, or tungsten) that come from (or are extracted in) the Democratic Republic of Congo and/or bordering countries. The concept of Conflict Minerals was introduced by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, a United States federal law in July 2010.

In turn, the European Parliament and the Council have in May 2017 passed the Regulation (EU) 2017/821 "laying down supply chain due diligence obligations for importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas".

The term "extended minerals" refers to cobalt and mica. Different from "conflict minerals" which are subjected to compliance under U.S. Dodd-Frank Act and the EU Conflict Minerals Regulation, "extended minerals" responsible sourcing is voluntary and allows downstream companies to collect refiner and processor information against potential risk sourcing minerals from conflict-affected and high-risk areas (CAHRAs).

Hubron does not source any raw materials from these CAHRAs. In addition, Hubron does not carry the above minerals in its portfolio, and neither are these minerals added to any masterbatches supplied.

Deforestation (Regulation (EU) 2023/1115, as amended)

Hubron black masterbatches do not contain raw materials with the relevant commodities as stated in Annex 1 of Regulation (EU) 2023/1115 Deforestation and Forest Degradation (EUDR). The commodity code for black masterbatch is 32064970, this also does not fall within scope of EUDR Annex 1.

End of life vehicles (ELV) (Directive 2000/53/EC, as amended)

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, 2005/673/EC & (EU) 2020/363 must be determined by the end user.

Genetically Modified Organism (GMO)

No GMOs are used during the manufacturing processes and the products have not been in contact with any GMOs during the manufacturing process.

Global Automotive Declarable Substance List (GADSL)

This is to certify that no ingredients used in the manufacture of black masterbatches are listed in the GADSL Reference List 01/02/2025, 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.

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

Heavy Metals

Antimony < 3.5	Lead < 3.5	Selenium < 3.5
Arsenic < 3.5	Cadmium < 0.4	Nickel < 3.5
Barium < 3.5	Chromium* < 2	Zinc < 3.5
Mercury < 3.5	Boron < 10	Cobalt < 3.5
Aluminium < 35	Copper < 10	Lithium < 1.8
Manganese < 10	Molybdenum < 10	Strontium < 10
Tin < 10		

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*

Inventories

Refer to individual SDS for listings on international inventories.

Kosher

Raw materials used in the production of black masterbatches are not of animal origin or alcohol. Our production equipment is not used for the manufacturing of products of animal origin or alcohol.

Microplastics (Regulation (EU) 2023/2055)

The EC adopted Commission Regulation (EU) 2023/2055 restricting sales of synthetic polymer microparticles on their own or intentionally added to mixtures, this is more commonly known as "the microplastics restriction". The new restriction affects products such as cosmetics, household and industrial detergents, cleaning products or granular infill for use on synthetic sports surfaces. It covers all synthetic polymer particles below 5mm that are organic, insoluble and resistant to (bio)degradation.

Manufacturers and industrial downstream users of synthetic polymer microparticles in the form of pellets, flakes, and powders used as feedstock in plastic manufacturing at industrial sites are exempt from the sales ban as stated in paragraph 4(a) of the annex to the regulation.

Nanomaterials

This substance contains nanoforms dispersed in a polymer carrier, the nanoforms will be present in a **micron-sized agglomerate** state meaning a collection of weakly bound particles or aggregates where the resulting external surface area is like the sum of the surface areas of the individual components and 'aggregate' means a particle comprising of strongly bound or fused particles.

Typical Particle Size Distribution of un-compounded nanoforms:

D10: 18-61nm
D50: 36-101nm
D90: 66-173nm

Measurement technique: STEM

Physical state: aggregates

Agglomeration state: Micron-sized agglomerates.

Please refer to SDS/TDS for nanoparticle content.

Operation Clean Sweep®

The plastics industry is committed to providing solutions to prevent marine litter. Pellet spills can occur at all stages along the plastics value chain, including production, handling, transportation, conversion and recycling.

Hubron (International) Ltd part of Operation Clean Sweep® (OCS), a program designed to prevent plastic pellet, flake, and powder loss into the environment. Hubron are united in our commitment to achieve zero plastic pellet, flake and powder loss to the environment.

To achieve this, we will:

- Comply with all our compliance obligations including relevant environmental legislation and regulations.
- Identify, evaluate and document the risk of pellet spills and loss to the environment resulting from our business activities & to then implement control measures.
- Provide appropriate leadership & ensure the involvement of our people and provide them with specific training.
- Implement documented procedures to prevent pellet loss conforming to the priority order of actions: prevention, containment and clean-up.
- Set clear targets and performance objectives within our business planning committing to continual improvement to achieve and maintain zero plastic pellet loss.
- Ensure our key supply chain demonstrate commitment and compliance to plastic pellet loss.
- Regularly review this policy to ensure that it is always relevant to our business activities.

Ozone Depleting Substances

I can confirm that Hubron masterbatches do not contain any Class I or Class II Ozone Depleting Chemicals as intentionally added substances. Additional information provided by our suppliers confirms that the substances used to manufacture the raw materials used to produce Hubron masterbatches also do not contain Ozone depleting chemicals as intentionally added substances.

Packaging and Packaging Waste (Directive 94/62/EC & successive amendments up until 2018/852/EU)

Article 11 of Directive 94/62/EC gives the criteria of purity for packaging such as the sum of the concentration levels in heavy metals: lead (Pb), cadmium (Cd), mercury (HG) and hexavalent chromium (CrVI) within the packing will have to be limited to 100 ppm. Please refer to 'Heavy Metals' section of this document for more details.

Compliance with Directive 94/62/EC and amending Directive (EU) 2018/852 must be determined by the end user.

Per- and Polyfluorinated Alkyl Substances (PFAS)

Hubron products do not contain intentionally added PFAS including:

- Per- and PolyFluorinated Carboxylic Acids (PFCA) and their derivatives, e.g. Long Chain PerFluorinated Alkyl Carboxylates (LCPFAC) and their salts and precursors, TFA, PFPA, HFBA, PFHxA, PFOZ, PFNA and "GenX substances").
- Per- and PolyFluorinated Sulfonic Acids (PFSA) and their derivatives, e.g. PFBS, PFHxS, PFOS, PFOSA.
- PerFluoroEther Carboxylic Acids (PFESA) and their derivatives.
- PerFluoroAlkyl Phosphonic or Phosphinic Acids (PFPhA,PFPIA) and their derivatives.
- Fluorinated polymers, e.g. PTFE, FEP, PVDF, PVF.
- PerFluoroPolyEthers (PFPE).

Persistent Organic Pollutants (POP) (Regulation (EU) 2019/1021, as amended)

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

Polycyclic Aromatic Hydrocarbons (PAHs)

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.

REACH Registration Status – EU (Regulation (EC) 1907/2006 REACH, as amended)

Hubron (International) Ltd manufacture Masterbatch products. These products are classified as mixtures and as such they are exempt from registration under EU REACH (EC) 1907/2006.

Where applicable, our raw materials are EU REACH registered as substances by our suppliers or Only Representatives (OR) according to Title II of REACH, from a European Legal Entity not located in the UK. In cases where an OR is involved in the supply chain, we work closely with the relevant supplier to ensure the substances are accounted for and controlled.

Most of our raw materials are sourced from a European supply chain and are therefore exempt from registration specified under Article 2(7) of REACH, this is to avoid dual registration. To meet the requirements of this exemption, we can confirm:

- The substance was registered before it was exported from the EU.
- The substance already registered and exported is the same as the substance being reimported.
- The substance proceeds from the same supply chain in which the substance was registered.

REACH Registration Status – UK (UK Statutory Instruments 2019 No.758, as amended)

The products listed in Annex I of this document only contain components that have been either registered, notified for downstream user import (DUIN), are exempt from registration or are not subject to registration according to UK SI 2019 No. 758 as amended (UK REACH).

REACH Authorisation List & Substances restricted under REACH

Based on our current knowledge, we confirm that these products:

- Do not contain substances subject to authorisation ((EC) 1907/2006 (REACH) Annex XIV).
- Do not contain any substances with conditions of restriction as described in Regulation (EC) No 1907/2006 (REACH) Annex XVII (as amended) relevant to any known or listed use of the products with the exception of Polycyclic Aromatic Hydrocarbons (PAHs), refer to PAH section for further information.
- Do not meet PBT or vPvB criteria under EU REACH Annex XIII.

Restriction of Hazardous Substances (RoHS) in Electrical and Electronic Equipment (Directive 2011/65/EU, as amended)

Annex II of Directive 2011/65/EU of the use of certain hazardous substances in electrical and electronic equipment lists substances that have maximum permitted concentration values. Black Masterbatches do **not** contain the substances PBB or PBDE mentioned in Annex II of 2011/65/EU.

The masterbatches listed in Annex I of this document do 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. Hubron masterbatches do **not** contain any of the 4 substances listed (DEHP, BBP, DBP, DIBP)

Substances of Very High Concern (SVHC)

Hubron masterbatches do not contain, as of the date of this document, any intentionally added "Substances of Very High Concern" above the 0.1% threshold as per the ECHA Candidate List Table (247 items, updated 21st January 2025), as published on the ECHA website (<https://echa.europa.eu/candidate-list-table>) in accordance with article 59(10) of the REACH Regulation (Regulation (EC) No. 1907/2006).

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.

Toy Safety (Directive 2009/48/EC and EN 71 Standard)

Not suitable for toy applications.

Turkish REACH (KKDIK)

All substances used in the manufacture of the products listed in Annex I of this document have been pre-registered by a Turkish entity.

Vegan Statement

Hubron masterbatches do not contain animal fibres, colouring dyes and components, glues, waxes, fats & oils or any other animal ingredients as listed on PETA's List (April 2015).

Volatile Organic Compounds (VOC)

Hubron masterbatches do not contain any Volatile Organic Compounds as intentionally added substances.

Waste Electrical and Electronic Equipment (WEEE) (Directive 2012/19/EU, as amended)

None of the substances listed in Annex VII (Selective treatment of the waste) of Directive 2012/19/EU on waste electrical and electronic equipment (WEEE), as amended, are intentionally added or used in the products listed in Annex I of this document.

Section 2 – Restricted Substances

None of the below substances are intentionally added or used during processing. The below list is a non-exhaustive list of substances:

Substance

2,4,6-tris(tert-butyl)phenol (2,4,6-TTBP)
 2-Isopropyl-thio+A2:A49xanthone (ITX)
 2-Ethylhexyl-4-dimethylaminobenzoate (EHDAB)
 4-Hydroxybenzophenone
 4-Methylbenzophenone
 Allergen
 Antimicrobials
 Antimony trioxide
 Asbestos compounds
 Asphalt
 Azocolorants
 Benzophenone
 Bisphenol A (2,2-bis(4-hydroxyphenyl)propane)
 C1-C4 halogenated hydrocarbons
 Chlorofluorocarbons (CFC)
 Chlorine, chlorinated polymers, chlorobenzenes
 Chlorinated paraffins (short-chain/long chain)
 Cobalt
 Decabromodiphenyl Ether (DecaBDE)
 Dibutylamine
 Diethanolamine (DEA)
 Diethylacetamide
 Diethylamine
 Dimethylamine
 Dinitrogen tetroxide (N₂O₄)
 Dinitrogen trioxide (N₂O₃)
 Epoxidized soybean oil (ESBO)
 Formaldehyde
 Hexachlorobutadiene (HCBD)
 Hydrochlorofluorocarbons (HCFC)
 Hydroxylamine (NH₂OH)
 Isocyanates
 Latex
 Melamine
 Monoethylamine (MEA)
 Monomeric, polymeric and organophosphate halogenated flame retardants (HFR)
 Nitrous Acid (HNO₂)
 Nitric Acid (HNO₃)
 N,N-dimethylacetamide (DMA)
 N,N-dimethylformamide (DMF)
 Nitrosyl halides (e.g. ClNO, BrNO)

N-Methylmorpholine (NMM)
 N-Methylpyrrolidine (NMP)
 N-Nitrosodiethylamine (NDEA)
 N-Nitroso-N-methyl-4-aminobutyric acid (NMBA)
 N-Nitrosodimethylamine (NDMA)
 N-Nitrosodiisopropylamine (DIPNA)
 N-Nitrosoethylisopropylamine (EIPNA)
 Nitrocellulose
 Nitrofurazone
 Nitric Oxide (NO)
 Organotin compounds
 Poly (1,4-cis-isoprene) (IR) aka Polyisoprene
 Poly (2-hydroxyethyl methacrylate) (pHEMA)
 Poly (2-hydroxypropyl methacrylate) (pHPMA)
 Per- and polyfluorinated alkyl substances (PFAS)
 Perfluorooctanoic acid (PFOA), its salts and PFOA-related substances
 Phenol, isopropylated phosphate (PIP (3:1))
 Phthalates
 Polyacrylonitrile (PAN)
 Polyactide (PLA)
 Polybrominated diphenyl ethers (PBDE)
 Polybutyl acrylate (PBA)
 Polybutyl methacrylate
 Polybutylene terephthalate (PBT)
 Polycellulose acetate
 Polycellulose nitrate (CN)
 Polychlorinated biphenyls (PCB)
 Polychlorinated terphenyls (PCT)
 Polychloroprene (Neoprene)
 Polydimethylsiloxane (silicone) (PDMS)
 Polyethyleneimine (PEI)
 Semicarbazide
 Sodium Nitrite (NaNO₂)
 Stoddard solvent
 Tetra butyl ammonium bromide (TBAB)
 Tributylamine (TBA)
 Triethylamine
 Trimethylamine (TMA)
 UV-328
 Volatile organic compounds (VOC) in wet-applied raw materials
 Wood treatments, including creosote or pentachlorophenol
 Substances listed in <https://echa.europa.eu/candidate-list-table>
 Substances listed in <https://echa.europa.eu/list-of-substances-subject-to-pops-regulation>
 Substances listed in <https://echa.europa.eu/authorisation-list>
 Substances listed in <https://echa.europa.eu/substances-restricted-under-reach>
 Substances listed in <https://echa.europa.eu/restricted-subs-referred-art-4-rohs>

We do not systematically perform specific test to verify the potential presence of these substances in the product and therefore cannot guarantee that there is no trace amount of these substances, as impurity or otherwise, in the product.

Annex I – List of Products

This compliance document is relevant to products listed below.

<p><u>Polyethylene Black Masterbatches:</u> PEB 309 PEB 1002 PEB 1070 PEB 1072 PEB 1121 PEB 1123 PEB 1150 PEB 1151 PEB 1385 PEB 1388 PEB 2000 PEB 2050 PEB 2589 PEB 4055 PEB 5502 PEB 7300 PEB 7302 PEB 7321 PEB 7331 PEB 7337 PECB 4057 PECB 8017 PECB 8024 PECB 8519</p> <p><u>Polypropylene Black Masterbatches:</u> PPB 7 PPB 128 PPB 129 PPB 130 PPB 131 PPB 773 PPAC 9117 PPCB 8050 PPCB 8060 PPCB 8061 PPFB 6395</p>	<p><u>Nylon (PA6) Black Masterbatches:</u> NBB 110 NBB 111 NBB 120 NBB 310 NBB 316</p> <p><u>Universal (EVA containing) Black Masterbatches:</u> PVB 20 PVB 21 PVB 22 PVB 182 PVB 190 PVB 192 PVB 212 PVB 312 PVB 1245</p> <p><u>Polystyrene Black Masterbatches:</u> PSB 183 PSB 313 PSB 317 PSB 573 PACB 252</p> <p><u>Styrene-Acrylonitrile (SAN) Black Masterbatches:</u> PAB 253</p> <p><u>Polyurethane Black Masterbatch</u> PUCB 112</p>
--	--