

February 18, 2019

Tai Tak Paper Co LTD
Tower 1 Millennium City 1
388 Kwun Tong Rd
KWUN TONG KOWLOON
Hong Kong

Product(s)	Crescendo® Paperboard
Manufacturing Location	WestRock Covington Mill Covington, Virginia USA

Directive EC 2009/48/EC on the Safety of Toys and Amendments

This technical documentation applies to the above listed products for use in the manufacture of toys (e.g., books or components of board games) as defined in the European Union's Directive 2009/48/EC of 18 June 2009 on the Safety of Toys. WestRock's paperboard products are not subject to this Directive. This document discloses information that is intended to enable toy manufacturers using these paperboard products to develop a list of components and materials used in the toy and conduct a chemical safety assessment.

The above listed WestRock paperboard products are consistent with the chemical specifications of Annex II of the Directive 2009/48/EC and EN 71-3:2013 Specification for Migration of Certain Elements – Category III. Specific limit values for aqueous or foam toy materials do not apply to paperboard products.

The following substances are not known to be intentionally added components of the listed Product:

- Bisphenol A (BPA)
- Flame Retardants including Tris(2-chloroethyl) phosphate (TCEP), tris(2-chloro-1-methylethyl) phosphate (TCPP), or tris[2-chloro-1-(chloromethyl)ethyl] phosphate (TDCP)
- Intentionally added fragrances
- Intentionally added nitrosamines or nitrosable substances
- Phthalate compounds
- Substances of Very High Concern (SVHC) in sufficient amount to trigger notification as defined under REACH

WestRock paperboard products are combustible (e.g., can burn if directly exposed to a sufficiently hot flame or other sources of ignition). The paperboard products have not been tested or evaluated under Annex II, Section II Flammability Point 1 (b) or 1(c).

The paperboard products produced by WestRock are considered "Articles" under the definition of the European Union's Regulation N° 1907/2006 on the *Registration, Evaluation, Authorisation and Restriction of Chemicals* (REACH) and are not regulated as a hazardous substance or mixture under the GHS/CLP-Regulation (EC) No 1272/2008. Within the REACH regulation (Article 3, paragraph 3) an "article" is defined as:



“an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.”

As our product is defined as an Article under EU REACH, an EU Safety Data Sheet has not been developed.

To further aid in a chemical safety assessment, a bill of substances is attached.

This determination is based upon information available as of the date of this submission, which primarily includes component supplier disclosures and Safety Data Sheets (SDSs). It may also include technical data sheets; any additional information provided by suppliers; testing, if applicable and available; and/or general industry knowledge.

This letter applies to the materials listed above as shipped and as of the date of shipment. This statement does not alter, amend, supersede or in any way affect WestRock's Terms and Conditions, and/or any other written contractual commitments between the parties.

A handwritten signature in black ink that reads "Richard J. Watro".

Richard Watro
VP Covington Operations

WestRock Company
104 E. Riverside Street
Covington, VA 24426

For additional information, please contact your WestRock account representative.

Bill of Substances

Product Names	Carolina® Crescendo® PrintKote® Tango®	
Product type	Paperboard	
Manufacturer	WestRock Virginia, USA	
Description	Rolls or Sheets of Paperboard	
Substance name	CAS number	% of substance in Product
Cellulose Fiber	9004-34-6	70-90%
Water (as absorbed moisture)	7732-18-5	4-8%
Starch	9004-53-9	5-10%
Kaolin Clay	1332-58-7	5-10%
Calcium Carbonate	1317-65-3	5-10%
Aluminum Sulfate	10043-01-3	1 - 5%
Cured Latex Polymers	Proprietary	1 - 5%
Rosin Size	Proprietary	1 - 5%
Optical Brightener	Proprietary	0 - 1%

Trace Elements *Analysis Results compared to CEN Standard EN 71-3:2013 + A3:2018*

Element	Typical Amount in Product EPA Total Method (mg/kg)	Soluble Metals Migration Limit Category III (mg/kg)
Aluminum	<2,000	70,000
Antimony	<1.0	560
Arsenic	<1.0	47
Barium	<50	18,750
Boron	<2.0	15,000
Cadmium	<1.0	17
Chromium	<2.0 total	460 Chromium (III) 0.2 Chromium (VI)
Cobalt	<1.0	130
Copper	<5.0	7,700
Lead	<5.0	23
Manganese	<50	15,000
Mercury	<1.0	94
Nickel	<2.0	930
Selenium	<1.0	460
Strontium	<50	56,000
Tin	<5.0 total	180,000 Tin 12 Organic Tin
Zinc	<50	46,000