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Statement on the Composition of Raw Materials

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Version: 3.1 (supersedes v3.0 of 02.10.2026: US FDA status of synthetic fluorphlogopite corrected; basis of the heavy-metal specification stated; status of CT-REG-022 corrected; OSC Grade and SC Grade addressed; Regulation (EU) 2026/1738 referenced; declarations aligned with the available evidence)

Scope: ChemTech CTA Series pearlescent pigments, 25 grades

See also: Doc. ID CT-REG-001, CT-REG-002, CT-REG-011, CT-REG-022, CT-REG-030, CT-REG-031

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1. Scope

This Statement covers the following ChemTech CTA Series pearlescent pigments — platelet-shaped synthetic fluorphlogopite (synthetic mica) coated with titanium dioxide and/or iron (III) oxide:

Pearlescent Pigment ChemTech CTA82	Pearlescent Pigment ChemTech CTA83	Pearlescent Pigment ChemTech CTA85	Pearlescent Pigment ChemTech CTA88	Pearlescent Pigment ChemTech CTA100
Pearlescent Pigment ChemTech CTA101	Pearlescent Pigment ChemTech CTA103	Pearlescent Pigment ChemTech CTA110	Pearlescent Pigment ChemTech CTA120	Pearlescent Pigment ChemTech CTA123
Pearlescent Pigment ChemTech CTA140	Pearlescent Pigment ChemTech CTA150	Pearlescent Pigment ChemTech CTA170	Pearlescent Pigment ChemTech CTA173	Pearlescent Pigment ChemTech CTA205
Pearlescent Pigment ChemTech CTA215	Pearlescent Pigment ChemTech CTA219	Pearlescent Pigment ChemTech CTA225	Pearlescent Pigment ChemTech CTA235	Pearlescent Pigment ChemTech CTA305
Pearlescent Pigment ChemTech CTA315	Pearlescent Pigment ChemTech CTA325	Pearlescent Pigment ChemTech CTA500	Pearlescent Pigment ChemTech CTA502	Pearlescent Pigment ChemTech CTA504

Product forms. This Statement applies to the CTA pigments supplied as loose powder and to the CTA pigment contained in OSC Grade and SC Grade. The anti-dusting treatment of OSC Grade and SC Grade is covered by the Statements on the Anti-dusting Treatment (Doc. ID CT-REG-031 and CT-REG-030, v1.1). The information on food contact materials, cosmetics and printing inks in this Statement refers to the pigment only.

2. Related statements

This Statement is the base compliance document for the CTA Series pigments. Specific topics are covered in dedicated Statements, which take precedence for their subject matter:

- Statement on the Absence of Microplastics — Doc. ID CT-REG-001, v2.0;
- Statement on Compliance with Regulation (EC) No 1907/2006 (REACH) — Doc. ID CT-REG-002;
- Statement on Regulatory Documentation (available and planned documentation, target dates) — Doc. ID CT-REG-011;
- Statements on the Anti-dusting Treatment, OSC Grade and SC Grade — Doc. ID CT-REG-031 and CT-REG-030, v1.1;
- Statement on Heavy Metals Content (guaranteed maximum limits per element, verified by ICP-MS at an accredited laboratory) — Doc. ID CT-REG-022, to be issued; target date in CT-REG-011.

3. General declaration

We hereby certify that no substances other than those stated in the analytical certificates and safety data sheets are intentionally added to our products.

4. Regulation (EU) 2025/40 on packaging and packaging waste (PPWR)

Regulation (EU) 2025/40 establishes a harmonised legal framework for all packaging placed on the EU market, including requirements on composition and hazardous substances. It applies from 12 August 2026. The pigments are not packaging themselves; where they are used in packaging materials or packaging formulations, the packaging manufacturer verifies that they do not hinder compliance with Regulation (EU) 2025/40.

- **Heavy metals.** Specification: sum of Pb, Cd, Hg and Cr(VI) < 100 mg/kg. Basis: third-party test report on acid-extractable metals and metalloids according to Council of Europe Resolution AP (89) 1 — As, Ba, Cd, Cr, Hg, Pb, Sb and Se not detected (reporting limit 0.001 %). Verification of the total content by ICP-MS at an accredited laboratory, with guaranteed limits per element, will be documented in the Statement on Heavy Metals Content (CT-REG-022).
- **PFAS.** Not intentionally added. Fluorine is a structural constituent of the inorganic synthetic fluorphlogopite lattice (see Section 21); total fluorine is therefore not a PFAS indicator for these products. No organofluorine compounds (PFAS, PFOA and related substances) are used or intentionally added at any stage of manufacture; the products contain no

carbon–fluorine bonds. Note for food-contact packaging: Article 5(5) of Regulation (EU) 2025/40 sets PFAS limits for food-contact packaging from 12 August 2026. Because of the fluorine in the fluorphlogopite lattice, total fluorine in packaging containing these pigments may exceed 50 mg/kg; in that case, proof of the quantity of fluorine measured as PFAS or non-PFAS must be provided on request. Supporting data on the inorganic origin of the fluorine are available on request.

5. Regulation (EC) No 1907/2006 (REACH) — restricted substances

To the best of our knowledge, based on our composition data and on the information provided by our suppliers, the products do not exceed the following concentrations:

- Phthalates DEHP, DBP, BBP, DIBP: 0.1 % (1000 mg/kg);
- Bisphenol A (BPA): 0.1 % (1000 mg/kg);
- Organostannic compounds (TBT, DBT, DOT): 0.1 % (1000 mg/kg);
- Dimethylfumarate (DMF): 0.00001 % (0.1 mg/kg);
- Formaldehyde: 0.1 % (1000 mg/kg).

None of the substances listed above is used at any stage of manufacture of the products.

6. REACH Annex XVII, entry 78 — synthetic polymer microparticles (microplastics)

Synthetic polymer microparticles are restricted from 17 October 2023 under Regulation (EU) 2023/2055 (entry 78, as amended by Regulation (EU) 2026/1168), unless subject to one of the derogations of entry 78, paragraphs 4, 5 and 6. We hereby certify that our products do not contain solid synthetic polymer microparticles in a concentration equal to or greater than 0.01 % by weight and, being entirely inorganic, fall outside the definition of synthetic polymer microparticles. The components of the anti-dusting treatment of OSC Grade and SC Grade are not synthetic polymer microparticles. Full statements: Doc. ID CT-REG-001 (v2.0), CT-REG-031 and CT-REG-030 (v1.1).

7. SVHC Candidate List (REACH Article 59(10))

Companies may have immediate legal obligations following the inclusion of a substance in the Candidate List, in particular under Articles 7, 31 and 33 of REACH. None of the substances on the Candidate List is present in the products in a concentration above 0.1 % (w/w); see Statement CT-REG-002 and Section 21.

8. End-of-life vehicles (Directive 2000/53/EC)

Member States shall ensure that materials and components of vehicles put on the market after 1 July 2003 do not contain lead, mercury, cadmium or hexavalent chromium other than in the cases listed in Annex II under the conditions specified therein. We hereby certify that our products comply with Article 4(2)(a): maximum concentration of Pb, Cr(VI) and Hg 0.1 % and of Cd 0.01 % by weight in homogeneous material. Regulation (EU) 2026/1738 on circularity requirements for vehicle design and on management of end-of-life vehicles replaces Directive 2000/53/EC and applies from 1 September 2028; this Statement will be updated accordingly.

9. Directive 2012/19/EU (WEEE) on waste electrical and electronic equipment

The WEEE Directive is intended to ensure the proper disposal of waste electrical and electronic equipment within the EU. The following are not intentionally added to our products and, to the best of our knowledge, are not present in them:

- polychlorinated biphenyls (PCB) and polychlorinated terphenyls (PCT); mercury; brominated flame retardants; asbestos; refractory ceramic fibres; radioactive substances;
- chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC), hydrocarbons (HC); ozone-depleting substances; fluorinated greenhouse gases.

Classification under Regulation (EC) No 1272/2008 (CLP): see Section 21.

10. Regulation (EU) 2024/590 on substances that deplete the ozone layer

The Regulation covers the substances internationally agreed in the Vienna Convention (1985) and the Montreal Protocol (1987) (Annex I) and further substances added by the EU (Annex II). We hereby certify that our products do not contain the following substances or their isomers: chlorofluorocarbons (CFCs); halons; carbon tetrachloride; methylchloroform (1,1,1-trichloroethane); methyl bromide; hydrobromofluorocarbons (HBFCs); hydrochlorofluorocarbons (HCFCs); bromochloromethane; 1-bromopropane; bromoethane; trifluoroiodomethane; chloromethane; 2-bromo-3,3,3-trifluoroprop-1-ene (2-BTP); dichloromethane (DCM); tetrachloroethene (PCE).

11. Regulation (EU) 2019/1021 on persistent organic pollutants (POP)

The Regulation bans or restricts the production and use of persistent organic pollutants in the EU. Status of the constituent substances: see Section 21.

12. Directive 2011/65/EU (RoHS)

The Directive restricts the use of hazardous substances in electrical and electronic equipment (EEE). The concentration values of Annex II apply to homogeneous materials of the final product, not to raw materials; exemptions are listed in Annex III. We hereby certify that our products do not exceed the values of the restricted substances referred to in Article 4(1): lead 0.1 %; mercury 0.1 %; cadmium 0.01 %; hexavalent chromium 0.1 %; PBB 0.1 %; PBDE 0.1 %; DEHP, BBP, DBP and DIBP 0.1 % each.

13. GADSL — Global Automotive Declarable Substance List

Information exchange along the vehicle supply chain helps manage risks from certain substances in vehicle parts. Any declaration process using the GADSL must respect the framework formulated in its preface. Status of the constituent substances: see Section 21.

14. Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food (incl. amendment (EU) 2025/351)

Only substances included in the Union list of authorised substances may be intentionally used in the manufacture of plastic materials and articles. Under Article 5(2)(b), colourants are excluded from the Union list. Where components of colourants are listed in the Union list, the relevant restrictions, such as specific migration limits (SML) or maximum content (QM), must be met; dual-use additives in colourants must also comply with the applicable provisions.

The products comply with the amendment (EU) 2025/351. To the best of our knowledge, they do not contain non-intentionally added substances (NIAS) of toxicological concern. Our pigments are made from high-purity raw materials; we do not use recycled raw materials. PFAS, PFOA and other fluorinated organic compounds are not intentionally added. Status of the constituent substances: see Section 21.

15. US TSCA Inventory

TSCA requires companies to notify the US EPA before manufacturing or importing a chemical substance that is not on the TSCA Inventory. For import into the USA, notification can only be made by a US-based importer. Status of the constituent substances: see Section 21.

16. US FDA, 21 CFR §§175–178 — indirect food additives

Synthetic fluorphlogopite is not listed in 21 CFR §§175–178. Food Contact Notifications that cover fluorphlogopite-based pigments are effective only for the products of the respective notifiers and do not cover ChemTech products. The CTA pigments are therefore not authorised by the US FDA for use in food-contact articles. Status of titanium dioxide and iron (III) oxide: see Section 21.

17. Swiss Ordinance on materials and articles in contact with food (RS 817.023.21)

Only substances listed in Annex 2 may be used, in accordance with the requirements laid down therein, in the manufacture of plastic materials and articles. By way of derogation, certain substances not listed in Annex 2, including dyes, may be used provided that this does not endanger the health of the consumer. Status of the constituent substances: see Section 21.

18. Cosmetics Regulation (EC) No 1223/2009

The Regulation applies to finished cosmetic products. Its annexes list prohibited substances (Annex II), restricted substances (Annex III), permitted colorants (Annex IV), preservatives (Annex V) and UV filters (Annex VI). This information on the constituent substances does not confirm the suitability of the pigments for cosmetic use. INCI names and status: see Section 21.

19. BfR Recommendations on food contact materials and German Printing Ink Ordinance (GIO)

Since Regulation (EU) No 10/2011 entered into force, the BfR Recommendations cover only substances without harmonised EU rules (e.g. polymerisation aids, catalysts, initiators, emulsifiers) and remain applicable to other materials such as silicones, paper and rubber. The German Printing Ink Ordinance sets a positive list and migration requirements for printing inks and varnishes on food contact materials. Status of the constituent substances: see Section 21.

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20. EuPIA Guideline on printing inks applied to food contact materials and Nestlé Negative List

EuPIA raw material selection criteria for colorants: heavy metals Sb, As, Cd, Cr, Pb, Hg and Se not detected in the acid-extraction test according to Council of Europe Resolution AP (89) 1 (reporting limit 0.001 %). The criteria for carbon black, organic pigments and polymers (toluene extractables, benzo(a)pyrene, PCB, hexachlorobenzene, 4-nitrobiphenyl, dioxins and furans, residual monomers, organotin catalysts) are not applicable to these inorganic products.

Our products meet the following requirements of the Nestlé Negative List: bisphenol A — not used; PFAS — not intentionally used; cadmium, lead, hexavalent chromium and mercury — not intentionally used, sum < 100 mg/kg (specification, see Section 4); no antimicrobial additives.

21. Information on substances

Table A — Identity and regulatory status

Substance	Fluorphlogopite (Mg3K[AlF2O(SiO3)3]), synthetic	Titanium dioxide	Iron (III) oxide
CAS No	12003-38-2	13463-67-7	1309-37-1
EC No	234-426-5	236-675-5	215-168-2
REACH registration No	01-2119971065-37-0010	01-2119489379-17-0146	01-2119457614-35-0180
Content, %*	40–84	0–58	0–45
Harmonised classification (CLP Annex VI)	None	None (the harmonised Carc. 2 entry was annulled by the CJEU)	None
Classification under CLP	Not classified	Not classified; present as a bound layer on the substrate, not as free powder	Not classified
Restriction under REACH Annex XVII	No	No	No
SVHC (REACH Candidate List)	No	No	No
POP (Regulation (EU) 2019/1021)	No	No	No
GADSL	Not listed	Not listed in GADSL 2026	Not listed

Table B — Food contact and chemical inventories

Substance	Fluorphlogopite (Mg3K[AlF2O(SiO3)3]), synthetic	Titanium dioxide	Iron (III) oxide
Regulation (EU) No 10/2011	Not listed	FCM No 610, REF 93440; PPA; no SML; no restrictions	REF 62240; PPA; SML (iron) 48 mg/kg; no other restrictions
US FDA, 21 CFR §§175–178	Not listed (see Section 16)	§175 listed, no limitations; §176 not listed; §177 listed, no limitations; §178 listed, colorant for polymers, no limitations	§175 listed, no limitations; §176 listed, no limitations; §177 not listed; §178 listed, no limitations
US TSCA Inventory	Listed, ACTIVE (EPA TSCA Inventory)	Listed, ACTIVE	Listed, ACTIVE
Drinking Water Directive (EU) 2020/2184, European positive list	Not listed	Listed, EUPL No 1401, material type: organic	Listed, EUPL No 1238, material type: organic
Swiss Ordinance RS 817.023.21	Not listed (inorganic substrate of the colourant; not subject to individual listing)	No 2217, REF 93440; C, AD (C.I. 77891); LSM 1 mg/kg; no restrictions	No 1188, REF 62240; AD; LSM 1 mg/kg; no restrictions

Table C — Cosmetics, BfR and printing inks

Substance	Fluorphlogopite (Mg3K[AlF2O(SiO3)3]), synthetic	Titanium dioxide	Iron (III) oxide
INCI name	SYNTHETIC FLUORPHLOGOPITE	TITANIUM DIOXIDE / CI 77891	CI 77491
Regulation (EC) No 1223/2009	Not limited; not an Annex IV colorant (inorganic substrate); not allowed as preservative or UV filter	Not limited; allowed as colorant (Annex IV/143) and as UV filter (Annex VI/27; nano: VI/27a); not allowed as preservative	Not limited; allowed as colorant (Annex IV/135); not allowed as preservative or UV filter
BfR Recommendations	Not listed	Listed	Not listed
German Printing Ink Ordinance (GIO)	Not listed	Listed (colourant)	Listed, permitted: Pigment Red 101, Subst. No 474, FRF II (colourants), SML: NN

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* Concentration ranges cover all 25 grades listed above; not every substance is present in every grade (iron (III) oxide: CTA305, CTA315, CTA325, CTA500, CTA502 and CTA504 only). For the exact concentration in each grade, see the TDS or the safety data sheet.

DISCLAIMER: This information is the result of our product evaluation based on the best knowledge at the time of publication and the regulations currently in force. Since we do not have information on the exact formulations, conditions of use, manufacturing processes, applications and other relevant parameters of our customers, we cannot indicate the suitability of the product for a particular application. It is the responsibility of the manufacturer of the final product or packaging to determine whether the raw material is suitable for the intended use. Regulations, as well as recommendations, are subject to change. We recommend that you periodically review the status of this product to verify its suitability for a particular application. Chemical Technologies SIA assumes no responsibility for compliance with legal requirements if its products are processed or modified by third parties.

Viktor Denezhnikov
Chairman of the Board
Date: 29.10.2026

