

Statement on the Composition of Raw Materials

Doc. ID: CT-REG-010

Version: 2.0 (supersedes v1.0 of 18.08.2026)

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See also: Related statements below

on the following chemical raw material(s):

Pearlescent Pigment ChemTech CTA82
Pearlescent Pigment ChemTech CTA83
Pearlescent Pigment ChemTech CTA85
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 CTA173
Pearlescent Pigment ChemTech CTA305
Pearlescent Pigment ChemTech CTA315
Pearlescent Pigment ChemTech CTA325
Pearlescent Pigment ChemTech CTA500
Pearlescent Pigment ChemTech CTA502
Pearlescent Pigment ChemTech CTA504

Related statements

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

- Statement on the Absence of Microplastics (Regulation (EU) 2023/2055) — Doc. ID CT-REG-001
- Statement on Heavy Metals Content (guaranteed maximum limits per element) — Doc. ID CT-REG-022, available on request
- Statement on Regulatory Documentation (available and planned documentation, target dates) — Doc. ID CT-REG-011

for the purposes of:

Regulation (EU) 2025/40 on Packaging and Packaging Waste

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 chemical raw materials mentioned above are not packaging themselves; however, their use in the manufacture of packaging materials or as components of packaging formulations requires verification that they do not hinder compliance with the obligations of Regulation 2025/40.

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

We hereby certify that our products meet the chemical specifications below:

- Sum of Pb, Cd, Hg and Cr(VI): < 100 mg/kg. Guaranteed maximum limits per element are declared in the Statement on Heavy Metals Content (Doc. ID CT-REG-022).

- PFAS: not intentionally added. Fluorine is a structural constituent of the inorganic synthetic fluorophlogopite lattice (see Information on Substances); total fluorine is therefore not a PFAS indicator for this product. 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 restricts PFAS from 12 August 2026 and uses 50 mg/kg total fluorine as a screening threshold. Because of the fluoride content of the fluorophlogopite lattice, total fluorine in packaging containing these pigments will exceed that threshold; in such cases the packaging manufacturer demonstrates compliance by targeted PFAS analysis (Art. 5(5), second subparagraph). Supporting data are available on request.

Regulation (EC) 1907/2006 (REACH) — restricted / limited chemicals in articles

We hereby certify that our products meet the chemical specifications below:

- Phthalates DEHP, DBP, BBP, DIBP: not exceeding 0.1% (1000 mg/kg or ppm)
- Bisphenol A (BPA): not exceeding 0.1% (1000 mg/kg or ppm)
- Organostannic compounds (TBT, DBT, DOT): not exceeding 0.1% (1000 mg/kg or ppm)
- Dimethylfumarate (DMF): not exceeding 0.00001% (0.1 mg/kg or ppm)
- Formaldehyde: not exceeding 0.1% (1000 mg/kg or ppm)

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

Regulation (EC) 1907/2006 (REACH), Annex XVII entry 78 — synthetic polymer microparticles (microplastics)

Synthetic polymer microparticles are restricted from 17 October 2023 under Regulation (EU) 2023/2055, 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 SPM definition. Full statement: Statement on the Absence of Microplastics, Doc. ID CT-REG-001.

SVHC Candidate List of substances of very high concern for Authorisation acc. to Regulation (EC) 1907/2006 Article 59(10)

Companies may have immediate legal obligations following the inclusion of a substance in the Candidate List, including in particular Articles 7, 31 and 33 of the REACH Regulation.

Information on SVHC substances: see Information on Substances below.

ELV Directive 2000/53/EC on end-of-life vehicles

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 cases listed in Annex II under the conditions specified therein.

We hereby certify that our products comply with Article 4(2), point (a): maximum concentration of Pb, Cr(VI) and Hg up to 0.1%, and Cd up to 0.01% by weight in homogeneous material.

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. We hereby certify that our products do not contain:

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

Information on hazardous substances: see Information on Substances below (classification under Regulation (EC) 1272/2008 (CLP)).

Regulation (EU) 2024/590 (ODS) 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). The production, placing on the market, import, export and use of ozone-depleting substances listed in the annexes are strictly regulated or banned.

We hereby certify that our products do not contain the following substances or their isomers:

- Chlorofluorocarbons (CFCs)
- Halons (fully halogenated aliphatic hydrocarbons)
- Carbon tetrachloride (tetrachloromethane, CTC)
- Methylchloroform (1,1,1-trichloroethane, TCA)
- Methyl bromide
- Hydrobromofluorocarbons (HBFCs)
- Hydrochlorofluorocarbons (HCFCs)
- Bromochloromethane
- 1-Bromopropane (n-propyl bromide)
- Bromoethane (ethyl bromide)
- Trifluoroiodomethane (trifluoromethyl iodide)
- Chloromethane (methyl chloride)
- 2-Bromo-3,3,3-trifluoroprop-1-ene (2-BTP)
- Dichloromethane (DCM)
- Tetrachloroethene (perchloroethylene, PCE)

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

The EU POPs Regulation bans or restricts persistent organic pollutants (POPs) from being produced or used within the EU market.

Information on POP substances: see Information on Substances below.

Directive 2011/65/EU (RoHS) on the restriction of the use of certain hazardous substances in electrical and electronic equipment

This Directive lays down rules on the restriction of the use of hazardous substances in electrical and electronic equipment (EEE). The substances mentioned below do not have concentration limits for use as raw materials; concentration values in Annex II apply to the final product (article), tolerated by weight in homogeneous materials. Some applications are exempted; please follow scope and dates of applicability in Annex III of Directive 2011/65/EU.

We hereby certify that our products do not exceed the values of restricted substances referred to in Article 4(1):

- Lead (0.1%)
- Mercury (0.1%)
- Cadmium (0.01%)
- Hexavalent chromium (0.1%)
- Polybrominated biphenyls (PBB) (0.1%)
- Polybrominated diphenyl ethers (PBDE) (0.1%)
- Bis(2-ethylhexyl) phthalate (DEHP) (0.1%)
- Butyl benzyl phthalate (BBP) (0.1%)
- Dibutyl phthalate (DBP) (0.1%)

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- Diisobutyl phthalate (DIBP) (0.1%)

GADSL — Global Automotive Declarable Substance List

The use of certain substances in vehicle parts may be a risk factor to human health and the environment.

Information exchange along the vehicle supply chain helps manage those potential risks while also meeting customer requirements. Any declaration process using the GADSL must respect the framework formulated in its preface.

Information on GADSL substances: see Information on Substances below.

Regulation (EU) 10/2011 on plastic materials and articles intended to come into contact with food (incl. amendment (EU) 2025/351)

One requirement of this Regulation is that only substances included in the Union list of authorised substances may be intentionally used in the manufacture of plastic materials and articles. According to Article 5.2(b), colorants are not regulated as additives and are excluded from the obligation of being listed in the Union list. Where components of colorants are listed in the Union list, the relevant restrictions such as specific migration limits (SML) or maximum content (QM) must be met, and where dual-use additives are present in colorants the legal provisions must also be followed.

We confirm that the products comply with the (EU) 2025/351 amendment and do not contain any unintentionally added substances (NIAS) of concern. Our colourants (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 to our products, so there is no reason to expect them to be present.

Information on food contact substances: see Information on Food Contact Substances below.

TSCA Inventory (USA)

TSCA requires companies to notify the EPA before manufacturing or importing a new chemical not listed on the TSCA Inventory, via a Premanufacture Notice (PMN) or a Significant New Use Notice (SNUN) if an existing substance will be used differently. For import into the USA, this notification can only be made by a US-registered importer. Substances on the Inventory do not need to be registered.

Information on TSCA Inventory status: see Information on Food Contact Substances below.

USA FDA Regulation Title 21 CFR §175–178 — Indirect Food Additives

The quantity of any food additive substance that may be added to food as a result of use in articles that contact food shall not exceed, where no limits are specified, that which results from use of the substance in an amount not more than reasonably required to accomplish the intended physical or technical effect in the food-contact article; shall not exceed any prescribed limitations; and shall not be intended to accomplish any physical or technical effect in the food itself, except as permitted by regulations in parts 170 through 189 of this chapter.

Information on food contact substances: see Information on Food Contact Substances below.

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

This Ordinance specifies the materials and objects intended to come into contact with foodstuffs and sets out the requirements relating thereto. 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, the following substances not included in Annex 2 may be used provided that this does not result in any danger to the health of the consumer: a) polymerisation auxiliaries; b) dyes; c) solvents; f) natural or synthetic polymeric substances with a minimum molecular mass of 1000 Da; etc.

Information on food contact substances: see Information on Food Contact Substances below.

Cosmetic Regulation (EC) 1223/2009

EU Cosmetic Regulation 1223/2009 applies to finished cosmetic products and sets out requirements for brands placing a product on the European market. Its annexes control what ingredients can be used, what is banned or restricted, and how products must be tested, labelled and assessed for safety. Annex II: substances prohibited in cosmetic products; Annex III: substances subject to restrictions; Annex IV: colorants allowed; Annex V: preservatives allowed; Annex VI: UV filters allowed.

Information on cosmetic ingredient INCI names and status: see the table below.

BfR Recommendations on Food Contact Materials

The BfR Recommendations originally focused on plastic food contact materials; since Regulation (EU) 10/2011 entered into force, they contain only those substances for which there are no harmonised EU regulations (aids to polymerisation, catalysts, initiators, production aids such as emulsifiers). For other not specifically regulated food contact materials (silicones, paper, rubber) the Recommendations can still be used.

Information on BfR status: see the table below.

German Printing Ink Ordinance (GIO)

The German Printing Ink Ordinance is a strict regulation governing printing inks and varnishes used on food contact materials in Germany. It establishes a positive list of approved substances to prevent harmful chemicals from migrating into food and dictates compositional and migration requirements depending on the type of contact.

Information on GIO status: see the table below.

EuPIA Guideline on Printing Inks applied to Food Contact Materials

EuPIA Guideline — General requirements / Raw Material Selection Criteria. We hereby certify that our products meet the purity requirements for colorants:

- Carbon black: < 0.1% toluene extractables, < 0.25 mg/kg benzo(a)pyrene
- Polychlorinated biphenyls: < 25 ppm
- Heavy metal limits for Sb, As, Cd, Cr, Pb, Hg and Se
- Hexachlorobenzene (relevant for blue, green and violet pigments): < 10 ppm
- 4-Nitrobiphenyl (relevant for certain blue pigments): < 25 ppm
- Dioxins and furans (relevant for certain blue, green, violet and some red pigments): acc. to Regulation (EU) 2023/915
- Polymers: specific migration limits for all residual monomers in polymers and resins used in FCM ink production, as in Table 1 of Annex I of Regulation (EU) 10/2011
- Polymers: organotin catalysts — indicative maximum limit 10 ppm (criteria for organic pigments, carbon black and polymers are not applicable to these inorganic products)

Nestlé Negative List

Nestlé standards set additional bans and restrictions beyond EU requirements. We hereby certify that our products meet the Nestlé standards: Bisphenol A — banned in all packaging where alternatives are available; per- and polyfluoroalkyl substances (PFAS) — no intentional use in packaging materials; heavy metals — cadmium, lead, chromium(VI) and mercury must not be intentionally used, total limit 100 mg/kg in material (or stricter if local regulation requires); no antimicrobial additives in packaging.

INFORMATION ON SUBSTANCES:

Substance name	CAS No	EC No	INDEX	REACH reg. No	%*	Classification under 1272/2008 (CLP)	Restriction under (EU) 1907/2006 (REACH)	SVHC under (EU) 1907/2006 (REACH)	POP under Regulation (EU) 2019/1021	GADSL Global Automotive Declarable Substance List
Fluorophlogopite (Mg ₃ K[AlF ₂ O(SiO ₃) ₃])	12003-38-2	234-426-5	NO	01-2119971065-37-0010	40–80	Not classified	NO	NO	NO	NOT LISTED
Titanium dioxide	13463-67-7	236-675-5	NO	01-2119489379-17-0146	17–45	Not classified (former harmonised Carc. 2 entry annulled by the CJEU; present as a bound layer, not free powder)	NO	NO	NO	NOT LISTED (removed from GADSL 2026 following annulment of the harmonised Carc. 2 classification)

Valid only for ChemTech CTA Series pearlescent pigments. Not applicable to modified or processed formulations.

Iron (III) oxide	1309-37-1	215-168-2	NO	01- 2119457614- 35-0180	0-10	Not classified	NO	NO	NO	NOT LISTED
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INFORMATION ON FOOD CONTACT SUBSTANCES:

Substance name	CAS No	EC No	Type	MW	%*	Regulation 10/2011 on plastic materials and articles intended to come into contact with food	USA FDA Regulation Title 21 CFR § 175-178 Indirect Food Additives	USA TSCA Inventory	Drinking Water Directive (EU) 2020/2184 EU positive list	Swiss Ordinance on materials and articles in contact with food (RS 817.023.21)
Fluorophlogopite (Mg ₃ K[AlF ₂ O(SiO ₃) ₃])	12003-38-2	234-426-5	Mono-constituent substance	421.24	40-80	NOT LISTED	§175 LISTED, no limitations; §176 LISTED, no limitations; §177 LISTED, cellophane, no limitations; §178 LISTED, colorant for polymers, no limitations	LISTED – ACTIVE	NOT LISTED	NOT LISTED (inorganic substrate of the colourant; not subject to individual listing)
Titanium dioxide	13463-67-7	236-675-5	Mono-constituent substance	79.87	17-45	REF: 93440; PPA; SML: NO; Restrictions: NO	§175 LISTED, no limitations; §176 NOT LISTED; §177 LISTED, no limitations; §178 LISTED, colorant for polymers, no limitations	LISTED – ACTIVE	LISTED, EUPL no: 1401, material type: organic	No: 2217, REF: 93440; C, AD (C.I. 77891); LSM: 1 mg/kg; Restrictions: NO
Iron (III) oxide	1309-37-1	215-168-2	Mono-constituent substance	159.69	0-10	REF: 62240; PPA; SML: 48 mg/kg; Restrictions: NO	§175 LISTED, no limitations; §176 LISTED, no limitations; §177 NOT LISTED; §178 LISTED, no limitations	LISTED – ACTIVE	LISTED, EUPL no: 1238, material type: organic	No: 1188, REF: 62240; AD; LSM: 1 mg/kg; Restrictions: NO

INFORMATION ON SUBSTANCES — COSMETIC INGREDIENT AND SPECIFIC FOOD CONTACT STATUS:

Substance name	CAS No	EC No	Type	MW	%*	INCI name	EU Cosmetic Regulation 1223/2009	BfR Recommendations on Food Contact	German Printing Ink Ordinance (GIO)
Fluorophlogopite (Mg ₃ K[AlF ₂ O(SiO ₃) ₃])	12003-38-2	234-426-5	Mono-constituent substance	421.24	40-80	SYNTHETIC FLUORPHLOGOPITE	NOT LIMITED; not an Annex IV colorant (inorganic substrate); NOT allowed as preservative/UV filter	NOT LISTED	NOT LISTED
Titanium dioxide	13463-67-7	236-675-5	Mono-constituent substance	79.87	17-45	TITANIUM DIOXIDE / CI 77891	NOT LIMITED + allowed as colorant: Annex IV/143; allowed as UV filter: Annex VI/27 (Annex VI/27a nano); NOT allowed as preservative	LISTED	LISTED (colourant)
Iron (III) oxide	1309-37-1	215-168-2	Mono-constituent substance	159.69	0-10	CI 77491	NOT LIMITED + allowed as colorant: Annex IV/135; NOT allowed as preservative/UV filter	NOT LISTED	LISTED, permitted. Pigment Red 101, Subst. No 474, FRF: II: Colourants; SML: NN

*For the exact concentration of each ingredient, see the TDS or 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 our products are processed or modified from their original form.

Viktor Denezhnikov
Chairman of the Board
Date: 01.09.2026