

## VICTREX™ Regulatory Overview

### Scope

In response to high levels of information requested by our customers, this document is intended to provide a comprehensive and timely initial response of regulatory information covering all Victrex product grades.

### Contents

1. Manufacturer Information
2. Company Overview
3. Material Safety Data Sheets (MSDS)
4. Regulatory Statements
5. Substance Statements
6. Flammability (UL 94)

### 1. Manufacturer Information

Company Name: **Victrex Manufacturing Limited**

Address: Hillhouse International, Thornton- Cleveleys, Lancashire, FY5 4QD, United Kingdom.

Phone Number: +44 (0) 1253 897700

Fax Number: +44 (0) 1253 897781

Homepage: [www.victrex.com](http://www.victrex.com)

E-mail address: RAPS@victrex.com

Company Name: **Victrex High-performance Materials (Shanghai) Co., Ltd**

Address: G-B, No. 1688 Zhanxing Road, Xinzhuang Industry Park, Shanghai 201108, China

Phone Number: +86 (21) 61136900

Fax Number: +86 (21) 61136968

Homepage: [www.victrex.com](http://www.victrex.com)

E-mail address: RAPS@victrex.com

Note: Products may be manufactured by **Victrex Manufacturing Limited** in the UK or by **Victrex High Performance Material (Shanghai) Co., Ltd** in China. Please refer to the specific Stock Keeping Unit (SKU) or 'Batch number' on the certificate of analysis (CoA) to indicate the product grade manufacturing location.



## Regional Importer Addresses

Victrex global office addresses available via the link - [Victrex Global Sites](#)

## 2. Company overview

Victrex is an innovative world leader in high performance polymers. Every day, millions of people rely on products or applications which contain our materials, from smartphones, aeroplanes and cars to oil & gas operations and medical devices. With over 30 years' experience, we are investing in product leadership to deliver new solutions to our customers and our markets.

## 3. Material Safety Data Sheets (MSDS)

All product specific MSDS's are available on the Victrex website <https://www.victrex.com/en/msds>

## 4. Regulatory Statements

The Regulatory statements referenced below can be found at : <https://www.victrex.com/en/resources>

Please refer to the link above for more information on our company statements and grade specific information.

### **Aerospace and Defense Declarable Substances List (AD-DSL)**

The Victrex grades detailed in the Regulatory statement are not expected to contain the substances listed within the AD-DSL Reference List.

Further information regarding AD-DSL can be obtained from: <http://www.iaeg.com/chemicalrpt/addsl/>

For product grade specific AD-DSL statement, please follow the link in the 'Regulatory Statements' section above.

### **Allergens**

The substances described in Annex II of Regulation (EU) No 1169/2011, known as substances or products causing allergies or intolerances have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any included additives.

For product grade specific Allergens statement, please follow the link in the 'Regulatory Statements' section above.

## Biocides

The biocidal substances, including 'existing' active substances and 'new' active substances as published at <https://echa.europa.eu/information-on-chemicals/biocidal-active-substances> have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any included additives.

For product grade specific Biocides statement, please follow the link in the 'Regulatory Statements' section above.

## Biological Origin Materials

No materials of biological origin\* have been added or used in manufacturing processes the Victrex products detailed in the regulatory statement.

\*Materials of biological origin are defined as materials incorporating derivatives of tissues or cells of human or animal origin or their derivatives which are non-viable or rendered non-viable (as referred to in regulation EU 722/2012, protecting against the risk of transmitting animal spongiform encephalopathies e.g. BSE and TSE)

For product grade specific Biological Origin Materials statement, please follow the link in the 'Regulatory Statements' section above.

## California Proposition 65 (CP65)

The substances listed in the CP65 list "Chemicals known to the State of California to cause Cancer or Reproductive Toxicity have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statements and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any included additives.

Please note, there is an exception statement for Victrex grades containing carbon black and Tetrafluoroethylene (TFE). For product grade specific CP65 statements, please follow the link in the 'Regulatory Statements' section above.



## Conflict Minerals

- **CMRT**

The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the RMI's Responsible Minerals Assurance Process (RMAP).

Victrex has a completed CMRT available for customers. Please follow the link in the 'Regulatory Statements' section above.

- **EMRT**

The Extended Minerals Reporting Template (EMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative to identify pinch points and collect due diligence information in the cobalt and mica supply chains. This is a template that was formally launched on October 20, 2021. Victrex has a completed EMRT available for customers. Please follow the link in the 'Regulatory Statements' section above.

## Endocrine Disruptors (ED's)

The substances listed on the European Endocrine disruptor website <https://edlists.org/> (Lists I, II and III) have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement. For product grade specific Endocrine Disruptors statement, please follow the link in the 'Regulatory Statements' section above.

## End of Life Vehicles (ELV)

Europe – Directive 2000/53/EC

China – GB/T 30512-2014

The substances specified in the European Directive (2000/53/EC) and China GB National standard (GB/T 30512-2014) have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statements.

For product grade specific ELV statements, please follow the link in the 'Regulatory Statements' section above.



## Food and Water Contact

Product specific Food Contact 'Declarations of Compliance' and Water Contact certifications to applicable global regulations are available upon request via the [RAPS@victrex.com](mailto:RAPS@victrex.com) e-mail.

## Global Automotive Declarable Substance List (GADSL)

All of the substances, (with the exception of Hydroquinone (CAS# 123-31-9)\*), listed within the 'GADSL Reference List have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statements and to the best of our knowledge at this time have not been intentionally added or used in the manufacturing processes of any included additives.

\* Hydroquinone-(HQ), CAS# 123-31-9; an essential ingredient for PEEK polymer manufacture, is consumed entirely during the polymerisation reaction. HQ has not been detected in our final polymer analysis and measured values have shown to be well below the GADSL reporting threshold of 0.1%

Further information regarding GADSL can be obtained from: <http://www.gadsl.org>

Please note, there is an exception statement for Victrex grades containing PTFE. For product grade specific GADSL statements, please follow the link in the 'Regulatory Statements' section above.

## Halogens

The Victrex products detailed in the regulatory statement have been shown through type testing to meet the criteria of 'non-halogenated' as defined in the International Electrochemical Commission's (IEC) standard - IEC 61249-2-21.

For product grade specific Halogens statement, please follow the link in the 'Regulatory Statements' section above.

## Nanomaterials

No 'Nanoparticles' or 'Nanomaterial' substances have been generated in the manufacturing process, nor intentionally added to the Victrex products detailed in the regulatory statement as defined within the EU Commission Recommendation 2022/3689/EU. For product grade specific Nanomaterials statement, please follow the link in the 'Regulatory Statements' section above.



## PFAS Statement

Victrex does not manufacture per- and polyfluoroalkyl substances (PFAS)\*. Independent third party laboratory analysis on representative product samples has confirmed that perfluoroalkyl substances, including PFOA (perfluoroctanoic acid), PFHxS (perfluorohexanesulfonate) and PFCA's (perfluorocarboxylic acids) C9-C14, are not detectable in Victrex grades down to test detection limits.

For the product grade specific PFAS Free statement, please follow the link in the 'Regulatory Statements' section above.

For more information regarding PFAS and Victrex products please see the following link

<https://www.victrex.com/en/pfas> or contact [RAPS@Victrex.com](mailto:RAPS@Victrex.com)

\*A small proportion of Victrex grades contain polytetrafluoroethylene (PTFE) or tetrafluoroethylene-perfluoro(propyl vinyl ether) copolymer (PFA), which are fluoropolymers that are part of the PFAS family of substances, as an additive – these are manufactured by third party companies which comply with the perfluoroctanoic acid (PFOA) restrictions of the Persistent Organic Pollutants (POPs) regulation (EU 2019/1021).

## Polycyclic Aromatic Hydrocarbon (PAH)

The substance group; "**Polycyclic Aromatic Hydrocarbon – (PAH)**", as defined within Commission Regulation (EU) No 1272/2013 have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any additives.

For product grade specific PAH statement, please follow the link in the 'Regulatory Statements' section above.

## Phthalates

Phthalate substances (commonly used as plasticisers) have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any additives. For product grade specific Phthalates statement, please follow the link in the 'Regulatory Statements' section above.

## Persistent Organic Pollutants (POP's)

The substances listed in European Regulation (EU) 2019/1021, Annex I (Part-A), Annex III and Annex IV, have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any additives.

For product grade specific POP's statement, please follow the link in the 'Regulatory Statements' section above.



## Railway Industry

All of the substances, (with the exception of Hydroquinone (CAS# 123-31-9)\*), listed within the 'Railway Industry Substance List (RISL) have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and to the best of our knowledge at this time have not been intentionally added or used in the manufacturing processes of any additives.

\*See regulatory statement for further details

Further information concerning 'Railway Industry Substance List (RISL)' can be obtained from

<http://unife.org/railway-industry-substance-list.html>

For product grade specific Railway Industry statement, please follow the link in the 'Regulatory Statements' section above.

## REACH

- **EU REACH**

Victrex Polyaryletherketone (PAEK) polymer grades are exempt from EU REACH registration requirements. However, the monomers used in the polymer manufacture are in scope and have been registered in accordance with EU REACH - Regulation (EC) No 1907/2006

For product grade specific REACH statement please follow the link in the 'Regulatory Statements' section above.

- **UK REACH**

Victrex Polyaryletherketone (PAEK) polymer grades are exempt from UK REACH registration requirements. However, the monomers used in the polymer manufacture are in scope and have been registered in accordance with UK REACH - S.I. 2020 No. 1577

For product grade specific REACH statement please follow the link in the 'Regulatory Statements' section above.

## Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS)

The Victrex products detailed in the regulatory statement do not contain the restricted substances listed in Annex II of Directive 2011/65/EC or GB/T 26572-2011 at concentration values above the maximum specified values by weight. For product grade specific RoHS statement, please follow the link in the 'Regulatory Statements' section above.



## **Substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR)**

All of the substances, with the exception of hydroquinone (CAS# 123-31-9)\*, listed under "Table 3.1 & 3.2" of "EU Directive 1272-2008-EC, 16<sup>th</sup> December 2008" ('CMR') (*Substances with harmonised classification and labelling i.e. Commission Delegated Regulation (EU) No 2022/692 amending the CLP Regulation (EC) No 1272/2008*), have not been intentionally added or used in the manufacturing processes the Victrex products detailed in the regulatory statement to the best of our knowledge at this time, have not been intentionally added or used in the manufacturing processes of any included additives.

\*Hydroquinone-(HQ), CAS#123-31-9 (Category 2); an essential ingredient for PEEK polymer manufacture, is consumed entirely during the polymerisation reaction. HQ is not detected in our final polymer analysis

For product grade specific CMR statement, please follow the link in the 'Regulatory Statements' section above.

## **Toxic Substances Control Act (TSCA)**

- TSCA Inventory**

The Victrex products detailed in the regulatory statement and where applicable the associated additives, have been registered on the TSCA inventory under their CAS Registration Numbers (CAS RN) or EPA Accession numbers.

- TSCA Persistent, Bioaccumulative, and Toxic(PBT)**

The United States Environmental Protection Agency (EPA) issued five final rules on January, 6<sup>th</sup> 2021 to reduce exposures to certain chemicals that are persistent, bioaccumulative and toxic (PBT). We confirm that to our knowledge, the substances listed, have not been intentionally added or used in the manufacturing processes of the Victrex products detailed in the regulatory statement and have not been intentionally added or used in the manufacturing processes of any additives

For product grade specific TSCA statements, please follow the link in the 'Regulatory Statements' section above.

## **Volatile Organic Compounds (VOCs)**

Victrex Polaryletherketone (PAEK) polymers are not classed as VOCs according to the following definitions:

Europe (2010/75/EU – 'volatile organic compound') ;

USA – 40 CFR Part51.100(s);

China (GB38508-2020)

PAEK polymers have a melting point above 340°C and do not evaporate under normal atmospheric conditions of temperature and pressure.

For product grade specific VOC statement please follow the link in the 'Regulatory Statements' section above.



## **5. Substance Statements**

For substance specific queries please see the Non Intentionally Added Substance (NIAS) Statement. The statement is available via the link in the 'Regulatory Statements' section above.

## **6. Flammability (UL 94)**

A full list of Victrex product grades and their associated UL 94 flammability V ratings is available via the UL Product iQ website - [Product iQ | UL Solutions \(ulprospector.com\)](https://ulprospector.com). Please search document name QMFZ2.E161131. Additional information is available via the link in the 'Regulatory Statements' section above.

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