

## **Manufacturer's Statement of Compliance**

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Rowmark is committed to ensuring the highest level of compliance across the many standards that govern various industry management systems. This statement is provided in response to requests by contractors, designers and end users of Rowmark manufactured sheet materials for regulatory compliance information.

Please note that Rowmark does not routinely analyze for additional substances that are not listed in our SDS documents. Unless otherwise indicated, the information provided is based on information from raw material suppliers, product composition and Rowmark's manufacturing process. Information on any OSHA hazardous components above 1% (by weight) and carcinogens above 0.1% (by weight) is provided in Section 3 of Rowmark's Safety Data Sheets (SDS).

Be advised that this document pertains strictly to Rowmark sheet manufactured in our facility in the United States.

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### **California Proposition 65**

Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The Proposition was intended by its authors to protect California citizens and the state's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals. This directive is administered by CA-EPA Office of Environmental Health Hazard Assessment (OEHHA).

The law requires that no person in the course of doing business intentionally expose an individual to a chemical known to the state of California to cause cancer or reproductive toxicity without giving a clear and reasonable warning. The Proposition 65 chemical list can be found at: <https://oehha.ca.gov/proposition-65/proposition-65-list>

Rowmark is committed to providing safe, high quality products to all customers. Some products manufactured by Rowmark may contain chemicals identified on this list in permissible exposure limits (PEL). Exposure levels are generally expressed as a daily exposure level and not as a concentration by weight of a product. Exposure levels are influenced by many factors including the intended use or application for the product. In some cases, testing and risk assessment may be required to establish acceptable exposure levels for certain applications and uses. Consumer products which can be demonstrated to have exposures less than the safe harbor level for specific chemicals, may not require labeling. Due to the presence of styrene, a Prop 65 listed chemical in Rowmark materials, Rowmark does label our sheet shipment cases to our distributors with the following warning.

 **Warning: This product contains chemicals including styrene, which is known to the State of California to cause cancer or other harm. For additional information, go to [www.p65warnings.ca.gov/](http://www.p65warnings.ca.gov/)**

If your company is using Rowmark materials as a component in a product to be delivered to consumers in California, Rowmark recommends you determine whether the warning requirements apply. Your company is solely responsible for determining whether your finished product needs to be labeled in compliance with Prop 65.

### **Polybrominated Diphenyl Ethers (PBDEs) *flame retardant chemicals***

PBDEs, also called "brominated flame retardants" are a group of flame retardant chemicals that are added to foam padding, plastics, and fabrics. Common PBDEs are pentaBDE (five bromine molecules), octaBDE (eight bromine molecules) and decaBDE (ten bromine molecules). Based on a review of our manufacturing process, specifications of raw materials and final product composition Rowmark materials are not known or expected to contain any of the referenced PBDE chemicals.

### Restriction of Hazardous Substances (RoHS 3)

Rowmark manufactured sheet materials are RoHS compliant with the European Union Directive 2002/95/EC for Restriction of Hazardous Substances (RoHS), the revised Directive 2011/65/EC (RoHS 2) and the latest amendment Directive (EU) 2015/863 (RoHS 3) and as such does not contain: lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), other polybrominated compound present in the product to a level equal to or less than 0.1% by weight. It further restricts the concentration of cadmium present in the product to a level equal to or less than 0.01% by weight.

Based on the final product composition and the specifications of the raw materials, no RoHS 3 substances are known or expected to be present in Rowmark materials.

### REACH – Substance of Very High Concern (SVHC-211)

In accordance with Article 59 of the European Regulation 1907/2006 on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), periodically the European Chemicals Agency (ECHA) publishes lists identifying substances of very high concern (SVHC) as defined in Article 57 of REACH and include in the REACH “Candidate List” for further regulation.

Based on our final product composition and the specifications of the raw materials, Rowmark manufactured sheet is not known to contain substances at greater than 0.1% (reporting threshold) which are identified on the full list of 211 SVHC Candidate List substances Jan. 2021 candidate list.

### Volatile Organic Compounds (VOCs)

In the Clean Air Act, 40 Code of Federal Regulations Section 51.100, the Environmental Protection Agency (EPA) defines a VOC as any compound of carbon excluding carbon monoxide, carbonic acid, metallic carbides or carbonates and ammonium carbonate, which participates in atmospheric photochemical reaction. EPA has excluded many compounds, which have been determined to have negligible photochemical reactivity such as: ethane, methane, methylene chloride, methyl chloroform, perchloroethylene, acetone, and numerous fluorochemicals. Water is not considered a VOC. Rowmark recommends review of State and Federal regulations to determine if a more restrictive requirement exists regarding analytical methods or chemical exclusions during the consideration of VOC content.

Based on the final product composition and the specifications of the raw materials, Rowmark sheet materials are not known or expected to contain substances identified as VOCs.

### Conflict Minerals (CRMT)

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the **Dodd-Frank Wall Street Reform and Consumer Protection Act** (the “Conflict Minerals Rule”). The Conflict Minerals Rule requires companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) originating in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”). Rowmark manufactured products do not contain conflict minerals, or to the extent they may indicate a trace amount, such products are “DRC conflict free” as defined by paragraph (e)(4) of Section 1502.

### Bisphenol A (BPA)

**CAS#: 80-05-7** IUPAC name: 4,4'-dihydroxy-2,2-diphenylpropane. Based on a review of the final product composition and the specifications of the raw materials, Rowmark products are not known or expected to contain BPA.

## Phthalates

Substances in this review: Bis(2-ethylhexyl)phthalate (DEHP), Dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), Diisononyl Phthalate (DINP), Diisodecyl phthalate (DIDP), Di-n-octyl phthalate (DnOP) or Di-n-hexyl phthalate (DnHP). Based on our final product compositions and the specifications of the raw materials, Rowmark sheet is not known or expected to contain substances that are identified as Phthalates.

Disclaimer: Rowmark is committed to excellence in product, performance and service in accordance with our **ISO 9001:2008** certification. This information is provided based on internal audits, information from raw material suppliers, product composition, Rowmark's manufacturing process and is revised as regulations change. The information contained in this document is being provided for informational purposes only and to clarify certain information regarding Rowmark's products. Nothing provided in this statement is (i) a representation, an express or implied warranty, or an agreement to indemnification by Rowmark, (ii) a statement which may form the basis of reliance by Rowmark, (iii) a modification of any term or conditions of sale agreed to between Rowmark and its customers.

Sincerely,



Eric Hausserman  
COO – Chief Operations Officer