

October 1, 2025

## **ROHS 3 – RESTRICTION OF HAZARDOUS SUBSTANCES**

Products: All Passive RFID Inlays & Tags, excluding Hard Tags

The EU Directive 2011/65/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) took effect July 1, 2011. This directive is aimed at protecting both human health and the environment. Commission Delegated Directive (EU) 2015/863, published on March 31, 2015 that added 4 new phthalate substances. Hence, Annex II to Directive 2011/65/EU is replaced by the text in the Annex II to Directive 2015/863. That now contains:

Restricted Substances	Maximum Concentration, %
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
Diisobutyl phthalate (DIBP)	0,1

Based on the information available to Avery Dennison Smartrac from its suppliers, the above mentioned substances are not intentionally added to the Avery Dennison Smartrac's products and if these would be present, then only as impurities in the raw materials used. The possible impurity levels do not exceed the maximum concentration values tolerated by weight in homogeneous materials as given in Annex II.