

Regulatory Compliance Statement

REACH, RoHS, POPs, PPWR & PFAS

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Area: AbsorGel®, Absorpole® & other desiccants manufactured and distributed by Absortech Group

This letter presents Absortech Group's current position regarding the major chemically related legal requirements that are relevant to our products.

REACH (EC) 1907/2006

REACH (Registration, Evaluation and Authorization of Chemicals) is a European chemical regulation applicable since June 1, 2007, to improve the protection of human health and the environment from the risks that can be posed by chemicals.

Absortech Group is a producer of desiccants and related products based on calcium chloride as the absorbing agent. Herewith we would like to inform you as our customer, that we understand and have taken the responsible actions towards the REACH-regulation.

To comply with the requirements in REACH (EC) 1907/2006, Absortech has REACH-registered Calcium Chloride (CaCl₂) (reg. no. 01-2119494219-28-0096).

Absortech Group also declares that, to the best of our knowledge, that none of the products that are manufactured and supplied by Absortech Group contains any Substances of Very High Concern (SVHC), identified in the REACH Candidate list or Annex XIV, in a concentration above 0,1% weight by weight (w/w). There are also no restrictions in the REACH Annex XVII that are applicable to the above-mentioned products.

RoHS 2011/65/EU

RoHS II (Restriction of the use of certain Hazardous Substances in electrical and electronic equipment) is a European directive applicable since January 2, 2013. This directive restricts (with exceptions) the use of a number of hazardous materials in the manufacture of various types of electronic and electrical equipment.

Desiccants of the type that Absortech Group produce, are often used in packaging of electric and electronic products covered by the RoHS-directive. Any packaging material (which includes desiccants) that will be discarded after a product's purchase is however, not considered to be part of the electronic equipment, so it does not fall within the scope of the RoHS-directive. Despite that, Absortech Group declares, to the best of our knowledge, that none of the products manufactured and supplied by Absortech Group contains any of the substances restricted in the RoHS-directive.

POPs (EU) 2019/1021

POPs (Persistent Organic Pollutants) is a European regulation applicable since June 20, 2019. This regulation serves to protect human health and the environment by restricting commonly used chemicals identified as persistent organic pollutants; for example, brominated flame retardants,

several pesticides and some PFAS's.

We hereby confirm, to the best of our knowledge, that none of the products manufactured and supplied by Absortech Group contains any of the substances restricted in the POPs-regulation.

PPWR (EU) 2025/40

PPWR (Packaging and Packaging Waste Regulation) is a new European regulation applicable from August 12, 2026. This regulation includes the chemical restrictions in used in the expiring packaging directive on heavy metals and some new restrictions on PFAS in packaging intended for food contact.

Absortech Group's products do not contain any restricted heavy metals and are not intended for direct contact with food and are hereby also compliant with PPWR (EU) 2025/40, article 5.

PFAS Statement

Some PFAS's are, as noted above, restricted in the POPs-regulation, but PFAS is a large group of substances with several sought-after properties such as grease, dirt and water repellent, heat stable and non-reactive. This substance type has a wide range of uses and has been used industrially since the 1950s, but it was not until the early 2000s before the consequences of their spread in the environment began to be taken seriously. The first problem with PFAS substances is that they are very stable and when they end up in the environment, they will not break down into naturally occurring substances in the foreseeable future. The severity of this is enhanced by their both water-soluble and fat-soluble properties which has resulted in that these substances are found everywhere in the environment, even where no such substances have been intentionally used.

Today there are PFAS-restrictions in POPs, REACH and PPWR:

- The POPs Regulation (EU 2019/1021) restricts certain PFAS substances with specific limit values.
- A number of other specific PFAS are restricted in REACH (EC 1907/2006) Annex XVII, entry 68.
- There are additional specific PFAS included in the REACH Candidate List for substances of very high concern, for which information to customers is required.
- The PPWR (EU 2025/40), restricts PFAS substances used for packaging material in direct food contact.

Absortech Group hereby confirms that no PFAS or PFAS-containing substances are intentionally added as raw materials or processing aids in the manufacture of our products. Absortech Group has routines for compliance evaluation of our raw materials and to the best of our knowledge, our products are considered PFAS-free, although trace levels from unintentional contamination cannot be completely ruled out.

The above PFAS statement applies to our products as used in their intended applications.

For the purpose of this statement, PFAS is defined in accordance with the OECD-definition¹ used in the ECHA Annex XV Restriction Report (version 2023-03-22)².

¹ OECD PFAS-definition: <https://pubs.acs.org/doi/10.1021/acs.est.1c06896>

² PFAS-restriction proposal: <https://echa.europa.eu/documents/10162/f605d4b5-7c17-7414-8823-b49b9fd43aea>

European Food Contact Regulation and FDA- U.S. Food & Drug Administration

The component of a food contact article, that is reasonably expected to become a component of food is potentially a food additive, subject to the premarket approval requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act). Specifically, substances that are reasonably expected to migrate to food because of their intended use are defined as food additives (FD&C Act Section 201(s)) if they are not prior sanctioned or generally recognized as safe (GRAS) for their use. All food additives are required to undergo FDA premarket approval in accordance with Section 409 of the FD&C Act. Absortech Desiccants (AbsorRange™) do not represent a food additive situation and therefore are not subject to the food additive regulations (do not require FDA clearance). The outer material (raw material, plastic) is in conformity to Regulation (EC) No 1935/2004, (EC) No 2023/2006, Commission Regulation (EU) No 10/2011 and is therefore approved to be used in contact with food. Absortech Desiccants (AbsorRange™) is approved for use in the transportation of food products if installed and used correctly and in accordance with the purpose of the product. Direct contact with food should be avoided. In the case of leakage due to accidents or incorrect use, the part of the food product that has been contaminated shall be considered as waste.



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