



Malloy
5411 Jackson Road
Ann Arbor MI 48106
Attn: Terri Roggenkamp

The CPSIA Regulations and the Graphic Arts Business

Dear Terri,

Thank you for your request for information as to the compliance of our adhesives and coatings to the "CPSIA 2008 - Lead in Substrate of Children's Products" as they are applied to Graphic Arts business.

Please find below an overview of Henkel's position with respect to the CPSIA which I hope you will find of use in your work. The CPSIA legislation seeks to limit Lead and phthalate (used as a plasticizer) in articles destined for use by children under 12.

The stimulus for this legislation stems from the children's toys from China issues that took place in the summer. The government quickly drew up legislation on the issue and passed it into law very rapidly the speed of implementation of the legislation has caught us all (book manufacturers and suppliers) by surprise.

Henkel have been working closely with the BMI CPSIA Task Force – who have engaged with a number of allied trade associations including our own the ASC (Adhesives and Sealants Counsel) to ensure that the book manufacturer's interests are considered in the implementation of this piece of Consumer Protection legislation. In the meantime the BMI is providing advice and updates for book manufacturer's for how and when to work through the changes that the CPSIA requires.

As a starting point Henkel's bookbinding adhesives do not contain any added Lead or phthalates and in compliance to the CONEG regulations Henkel requires its raw material suppliers to provide us with a declaration to the effect that our raw materials also have no added Lead. The CONEG regulations require adhesives to have a total heavy metal limit of less than 100 parts per million all the testing that we have undertaken to date shows our adhesives are well inside this limit.

In order to provide reassurance to our customers and to support the Book Manufacturing Industry we are pursuing the following course of action.

1. Work with the BMI

We have submitted our existing Lead testing records to support to the work of the BMI's CPSIA Task Force and we are actively providing advice and data to support the efforts of the BMI in this matter.

2. Current Test Results



In early December we submitted for testing a cross-section of our Graphic Arts adhesives which representative of the formulations that we supply in the industry, the results of the majority of the tests are shown in summary on the table at the end of this letter, test certificates are posted at both <http://www.rrd.com/cpsia> and www.bmibook.org - with a home page link to "CPSIA Book Test Data". Further test results will follow shortly.

3. Phthalate Content

In Q409 the CPSC invited comments from interested parties to help identify both test methods and test standards for phthalates with a close date of January 12th 2009. We have received no formal information on the methods and standards for phthalate testing required by the CSPC however we took the step of testing a representative range of our current graphic to a commonly used European Union standard test 2005/84/EC which is a tests for 6 common phthalates - we don't know if this will fit the eventual requirement for CPSIA compliance but it does indicate the levels of common phthalates in the adhesives selected for testing. Please see these shown below and on the websites referred to above alongside the Lead testing results.

The test work that we have undertaken is representative of Henkel's North American Graphic Arts adhesive line and is aimed at providing supporting evidence to Book Manufacturers for the preparation of general conformity certificates (GCCs) which will be required from February 10th under Section 102(a)(1) of the "CPSIA 2008 - Lead in Substrate of Children's Products" regulations..

Please feel free to contact me should you have any questions.

Yours sincerely,

Richard Stanley
 Business Director - Graphic Arts North America
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Product	Technology	End Use	Lead Content ppm	Phthalate Content Ppm
34680C	COOL EVA	Spine Glue	<8.81	<0.006
346538	EVA	End Sheet Glue	<8.33	<0.006
34163B	350 EVA	Spine Glue	<9.38	<0.006
34354B	Semi-PSA	Side.lining, tightbacking, end sheet, headband, hinge	<11.5	<0.006
346544	Rubber	Spine Glue	<6.82	<0.006
37103	EVA	Clear Side Glue	<7.5	<0.006
341225	Rubber	Spine Glue	<9.38	<0.006
341213	EVA	Side Glue	<8.82	<0.006
CPSIA Limit			600	0.100