

Mirka Restricted Materials List

The Mirka Restricted Materials List (RML) specifies the requirements of chemical substances and is the main chemical compliance requirement for Mirka Ltd products. The objective is to achieve compliance with legislations, the Mirka Ltd company policy, and to facilitate a consistent approach to managing chemical substances.

Chemical substances on the Mirka Restricted Materials List can be present in the maximum noted threshold level in articles or homogenous material. The most restrictive of local law and the RML shall take precedence. Products, components, materials or chemicals containing a chemical substance listed on the RML as banned, restricted, reportable, or of concern above stated threshold shall not be supplied to, and can be rejected by Mirka Ltd.

Mirka suppliers are required to comply with and report to Mirka Ltd if the supplied products contain any RML substances. The supplier should give the name, CAS number, and concentration of the RML substance/s in % w/w of the product. The limit value for information on the presence of all substances is 0.1 %. However, if lower concentration values are specified by legislation or industry standards, the most stringent value applies, and the substance and concentration must be reported (e.g., the legal limit value for dimethyl fumarate is 0.1 ppm in the EU).

In case a banned or restricted substance is discovered in a delivery from a supplier or included in a Mirka Ltd product, component, material or chemical, the supplier agrees to indemnify and hold Mirka Ltd harmless from, against and in respect of all damage or loss. Mirka Ltd reserves the right to take appropriate action until the necessary measures have been implemented and approved by Mirka Ltd.

Mirka Ltd always strives to follow national and local legislations. Substances that are not included in the RML are not automatically acceptable to use. In addition, substances that are legal to use may be included on the RML or may be banned, restricted, or of concern in our internal processes.

Once new substances are added to the lists of substances (e.g., REACH Candidate List for Authorization (SVHC)), the reporting requirements shall be fulfilled without undue delay.

Table 1. The Mirka Restricted Materials List (RML) of Banned, Restricted, and Substances of Concern

Regulation/Directive/Substance Group	Link to Regulation/Directive/List of substances
REACH Annex XIV (Authorization) (List of substances subject to authorization)	Annex XIV (Authorization)
REACH Annex XVII (Restrictions) (Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles)	Annex XVII (Restrictions)
REACH Candidate List for Authorization (SVHC)	Candidate List for Authorization SVHC
REACH Registry of SVHC intentions until outcome	SVHC Intentions Until Outcome

Substances classified as Carcinogenic, Mutagenic or Reprotoxic (CMR). CMR substances Category 1 and 2. (Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures)	CMR Category 1 and 2
Per- and polyfluoroalkyl substances (PFAS) 1907/2006/EC (REACH) Annex XVII TSCA 8(a)(7) Reporting and recordkeeping requirements for Perfluoroalkyl and Polyfluoroalkyl substances	Annex XVII (Restrictions) Per- and polyfluoroalkyl substances (PFAS) - ECHA
RoHS Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment and its amendments	RoHS Directive
WEEE Directive 2012/19 on waste electrical and electronic equipment.	WEEE Directive
Persistent Organic Pollutants (POPs) (Stockholm Convention and Regulation (EU) 2019/1021)	Stockholm Convention POP Regulation
Conflict Minerals (U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, which on session 1502 introduces due diligence and disclosure requirements linked to the use of certain “conflict minerals” originating in the Democratic Republic of Congo or adjoining countries)	Conflict Minerals Regulation
Fluorinated Greenhouse Gases (Kyoto Protocol and Regulation (EU) No 517/2014)	Fluorinated Greenhouse Gases Regulation
Biocidal Active Substances (Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products)	Biocidal Products Regulation Biocidal Active Substances - ECHA
California Proposition 65 (officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986)	Proposition 65
Global Automotive Declarable Substance List (GADSL)	GADSL
USA: Toxic Substances Control Act (TSCA) - The Initial 10 Chemicals	Risk Management for Existing Chemicals under TSCA US EPA
ChemSec “SIN List”	SIN List
Packaging and Packaging Waste Directive. EU 94/62/EC	Packaging and Packaging Waste Directive
Packaging and Packaging Waste Regulation, EU 2025/40	Regulation - EU - 2025/40 - EN - EUR-Lex
Nanomaterials	Nanomaterials - ECHA
Microplastics	Microplastics - ECHA
Critical Raw Materials The 2020 EU Critical Raw Materials List	Critical raw materials - European Commission
Silicones (Restricted due to contamination risk. Mirka consumers may get uneven paint results)	

PVC , Polyvinyl chloride	PVC - Substance Information Regulation 2023/923
Asbestos fibers	Annex XIV (Authorization)
PAH 1907/2006/EC (REACH) Annex XVII Entry 50	(EU) 2021/1199
Battery regulation 2023/1542/EU (Battery Regulation)	(EU) 2023/1542
Endocrine disruptors	Endocrine disruptors - ECHA

Change log

Version	Change	Regulation/substance or other applicable rule
4.0	Added entry	<p>Per- and polyfluoroalkyl substances (PFAS)EU Critical Raw Materials</p> <p>USA: Toxic Substances Control Act (TCSA) - The Initial 10 Chemicals</p> <p>Asbestos fibers</p> <p>EU PAH</p> <p>EU Battery regulation</p> <p>Microplastics</p> <p>Endocrine disruptors</p>