



REACH Position Statement

We, Reflex Etikett, Reflex Flexible Packaging, Reflex Labels, Reflex Plus, Reflex Polska, Macfarlane Labels and Webflex (collectively known as Reflex), would like to assure our customers that Reflex fulfils all the set requirements of REACH¹.

Reflex is a “down-stream” user of chemicals and we have taken the necessary steps to make sure that all our chemical suppliers are aware of the REACH regulations.

Packaging substrates are not considered “substances” under REACH but are classed as “articles².”

All our raw material suppliers are aware of the candidate list and there are systems in place to prevent the use of these chemicals in any new product. When a chemical is added to the Candidate List, suppliers of Reflex aim to ensure that substances of very high concern (SVHC) are progressively replaced by less dangerous substances where feasible alternatives exist. Substances that have been identified as SVHCs and included in the Authorisation List are not used or placed on the market for a use after a specified date, known as the sunset date, unless the use has been authorised or is exempt from authorisation. Reflex actively follows any additions to the Candidate and Authorisation List. Chemicals with ‘Conditions of Restriction’ are also monitored and not used where such restrictions exist – up to and including Annex XVII of REACH (24th October 2024). Products provided by Reflex which are on the Authorisation list do not contain any substances of very high concern (SVHC) above the specified thresholds set out under EU nor UK REACH.

1. REACH, EU Regulation (EC) No 1907/2006

EU Regulation (EC) No 1907/2006 concerning Registration, Evaluation and Authorisation of Chemicals (REACH) is the European chemicals legislation that came into force in June 2007. REACH aims to promote sustainable development by improving the protection of human health and environment.

2. REACH UK

Both the EU and UK now have two separate REACH legal systems which are not linked. Reflex continues to meet the requirements for notification regarding “Candidate List of Substances” under UK REACH legislation.

3. Article

An article is the legal term under REACH for any object that has been given a particular shape, surface or design so that it can be used for a specific purpose.



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Last reviewed: 4th February 2026

Next scheduled review: 3rd February 2027



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