Regulatory Data Sheet

Copyright,2026, 3M Company.
All rights reserved. Copying and/or downloading of this information for the purpose of properly utilizing 3M products is allowed provided that: (1) the information is copied in full with no changes unless prior written agreement is obtained from 3M, and (2) neither the copy nor the original is resold or otherwise distributed with the intention of earning a profit thereon.

This Regulatory Data Sheet is provided as a courtesy in response to a customer request.

Document Group:	10-2686-3	**Version Number:**	19.02
Issue Date:	02/19/26	**Supersedes Date:**	02/06/25

3M(TM) Scotch-Weld(TM) Metal Primer 3901

3M
Industrial Adhesives and Tapes Division
3M Center, St. Paul, MN 55144-1000, USA
1-888-3M HELPS (1-888-364-3577)

RDSs are available at www.3M.com

Regulations and Industry Standards

SDS (US OSHA)
See Safety Data Sheet (SDS) for hazard and other regulatory data.
China RoHS
This product or part does not exceed the maximum concentration values (MCVs) in China RoHS GB/T 26572-2011/AMD No. 1 (Requirements of Concentration limits for certain restricted substances in electrical and electronic products), which means that each of the homogeneous materials within this product is below the following MCVs: (a) 0.1% (by weight) for lead and its compounds, mercury and its compounds, hexavalent chromium and its compounds, polybrominated biphenyls, polybrominated diphenyl ethers, di(2-ethylhexyl) phthalate, butyl benzyl phthalate, dibutyl phthalate, or diisobutyl phthalate; and (b) 0.01% (by weight) for cadmium and its compounds.
CONEG
This product complies with the US CONEG (Coalition of Northeastern Governors) Model Toxics in Packaging Legislation as there is no intentionally added lead, cadmium, hexavalent chromium or mercury, and the sum total concentration of these substances in the product does not exceed 100 ppm by weight.
Conflict Minerals
Conflict Minerals, which the U.S. Securities and Exchange Commission (“SEC”) has defined as gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (tin, tantalum, or tungsten), are not contained in or are not “necessary to the functionality or necessary to the production” of the above-listed product, as the term “necessary to the functionality or the production” is defined under the SEC’s Conflict Minerals Rule. 77 Fed. Reg. 56274 (Sept. 12, 2012).
EU REACH
This product is a chemical preparation under Regulation No 1907/2006 of the European Parliament and the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). To the best of its knowledge, 3M has pre-registered and has registered/is intending to register all substances of its chemical preparations that it currently imports into and/or manufactures in the European Union that are in scope for (pre-)registration by 3M. It has a required safety data sheet.
EU REACH

This product, including any article that the product is composed of, does not contain at greater than 0.1% by weight a Substance of Very High Concern (SVHC) substance identified according to Article 59 of REACH. This declaration reflects the substances on the candidate SVHC list, effective February 2026.

EU RoHS

This product does not exceed the maximum concentration values (MCVs) set under EU Directive 2011/65/EU (RoHS recast/RoHS 2), as stated in Annex II to that directive. This means that each of the homogenous materials within this product does not exceed the following MCVs: (a) 0.1% (by weight) for lead, mercury, hexavalent chromium, polybrominated biphenyls or polybrominated diphenyl ethers; and (b) 0.01% (by weight) for cadmium.

EU RoHS Phthalates

This product does not exceed the maximum concentration values (MCVs) for phthalates set under EU Directive 2011/65/EU (RoHS recast/RoHS 2), as amended by EU 2015/863, which applies to finished EEE after July 22, 2019 for Category 1-7, 10-11 products and after July 22, 2021 for Category 8 and 9 products. This means that each of the homogeneous materials within this product does not exceed the MCV of 0.1% (by weight) for each of the following phthalates: DEHP, BBP, DBP, and DIBP.

Halogens – IEC 61249-2-21

This product meets the non-halogenated permissible limits of the International Electrotechnical Commission (IEC) 61249-2-21 standard as having less than 900 ppm bromine, less than 900 ppm chlorine, and less than 1500 ppm total bromine and chlorine.

Stockholm Agreement

This product does not contain Persistent Organic Pollutants (POPs) at or above applicable thresholds per Annexes A, B, and C of the Stockholm Convention, May 2004 and subsequent amendments.

Sustainability Advantage: Recycled content

This product does not contain recycled content.

TSCA Section 6

This product is not known to contain 2,4,6-Tri-tert-butylphenol (CAS 732-26-3).

TSCA Section 6

This product is not known to contain Decabromodiphenyl Ether (Deca-BDE) (CAS 1163-19-5).

TSCA Section 6

This product is not known to contain Hexachlorobutadiene (HCBD) (CAS 87-68-3).

TSCA Section 6

This product is not known to contain Pentachlorothiophenol (PCTP) (CAS 133-49-3).

TSCA Section 6

This product is not known to contain Phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CAS 68937-41-7).

Chemicals and/or Compounds of Interest

Asbestos : Not known to contain.
Gallium (CAS 7440-55-3) : Not known to contain.
Germanium (CAS 7440-56-4) : Not known to contain.
Materials of Human or Animal Origin : Not known to contain.
Rare Earth Elements (REE) or Rare Earth Metals (REM) : Not known to contain.

Per- and Polyfluoroalkyl Substances (PFAS)

PFAS refers to a broad range of thousands of materials with varying properties and characteristics, which may include high resistance to oil, water, temperature, chemicals, and fire, which makes certain PFAS critical to the functioning of many modern products.

Per- and polyfluoroalkyl substances (PFAS) : Not intentionally added.
Perfluorohexane sulfonate (PFHxS) : Not intentionally added.
Perfluorohexanoic acid (PFHxA) (CAS 307-24-4) : Not intentionally added.
Perfluorooctanesulfonic Acid (PFOS) (CAS 1763-23-1) : Not intentionally added.
Perfluorooctanoic Acid (PFOA) (CAS 335-67-1) : Not intentionally added.

Definitions

Note: all Definitions take Disclaimers into account and apply to the "Chemicals and/or Compounds of Interest" and/or "Per

and poly-fluoroalkyl Substances (PFAS)" sections only

Terms	Definitions
Contains*	Present based on composition information disclosed by 3M suppliers, analytical testing, or both.
Not known to contain*	1. Analytical measurement for presence is not currently available; 2. If measurement is possible, a) The material has not been identified or disclosed to 3M and b) The material has not been specifically quantified or detected; OR c) Based on information from raw material suppliers, possible presence as an impurity or by-product at or below regulatory thresholds (e.g., 0.1 or 0.01 %)
Intentionally added**	Desired in the final product to provide a specific characteristic, appearance, or quality and/or to perform a specific function.
Not intentionally added**	By-product(s), impurity(ies) and/or unintended artifact(s) resulting from the formulation and/or manufacture of a material.
By-product***	A chemical substance produced without a separate commercial intent during the manufacture, processing, use, or disposal of another chemical substance or mixture.
Impurity***	A chemical substance which is unintentionally present with another chemical substance (e.g., residuals, catalysts, process solvents).

**Terms apply to the Chemicals and/or Compounds of Interest Section only (if section is present)*
***Terms apply to the PFAS Section only (if section is present)*
****Terms apply to both the Chemicals and/or Compounds of Interest and PFAS Sections (if section(s) are present)*

Disclaimers: The information provided in this document related to material content represents 3M's knowledge and belief, which may be based in whole or in part on information provided by suppliers to 3M. This is intended to answer commonly asked questions about 3M products and is not intended to be a comprehensive listing of all substances that may be of interest or that may be regulated in this or other 3M products, nor is it intended to be a comprehensive summary of any and all regulations that may apply to this product. Where substances are listed, their listing does not infer or constitute a judgment as to their safety, environmental or health impacts. Information is supplied upon the condition that the persons receiving the same will make their own determination as to its suitability for their purposes prior to use. Customers are encouraged to consult with legal and regulatory experts to determine applicable regulations in light of intended use of the product.

Limitation of Remedies and Liability: In the event any Product is proven not to conform with the information in this document, then to the extent permitted by law, 3M's entire liability and Buyer's exclusive remedy, will be at 3M's option either: (i) replacement of Product with a conforming product, or (ii) refund of the purchase price paid by Buyer for each non-conforming Product, within a reasonable time after written notification of said non-conformance and return of said Product to 3M. 3M shall not under any circumstances be liable for direct, incidental, special, or consequential damages (including but not limited to loss of profits, revenue, or business) related to or arising out of this certification, including, the use, misuse or inability to use the Product. Unless stated otherwise in writing, the foregoing language cannot be waived, modified, or supplemented in any manner whatsoever.