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REACH Conformity declaration

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In response to an increasing number of customer inquiries on the European REACH regulation, this letter has been developed to identify actions taken and planned in response to the regulation.

We evaluate the European REACH regulation regularly. As a result of an extensive review of this regulation and guidance documents available from the European Chemical Association (ECHA) website, we have determined our responsibilities and actions as follows:

1. We have not pre-registered or registered any substances for REACH.
2. We are an article manufacturer and an article manufacturer does not typically register substances. The scenario where an article manufacturer would need to register is when substances in articles are intended to be released in an amount exceeding one metric ton per year. For the products that we manufacture, there are no substances that are intended to be released into the environment.
3. The ECHA website (<http://echa.europa.eu/>) periodically announces the release of lists of additional substances that have been accepted for inclusion in the Candidate List of Substances of Very High Concern (SVHC) subject to authorization. We regularly monitor the ECHA website (latest update 15 January 2019) for the addition of new substances as SVHC in order to determine if they may be present in our products. We will provide required 'notification' in accordance with Article 7 of REACH or 'communication' in accordance with Article 33 of REACH to affected customers should we determine that any substance added to the candidate list of SVCH is in our products in an amount greater than 0.1% w/w.
4. Our assessment of the presence of SVHC is based on comparing the chemical CAS (Chemical Abstract Service) numbers for substances classified as SVHC with a list of CAS numbers that we have compiled from MSDS files obtained for the chemicals and relevant materials which we purchase for use in our products.

Kind regards,

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