

Thorsis Technologies statement on REACH Directive 1 January 2019

Your inquiry about "REACH" for Thorsis Technologies products

Dear valued customer

European regulation No 1907/2006 "REACH" (**R**egistration, **E**valuation and **A**uthorization of **C**hemicals) came into force on June 1, 2007. REACH regulates the use of chemical substances within the European Union, particularly those identified as "Substances of Very High Concern (SVHC)". A recapitulation of the regulations of REACH is attached hereto.

For purposes of the REACH legislation, Thorsis Technologies is neither a manufacturer nor an importer of chemical products. The products manufactured by Thorsis Technologies are considered as "Articles" under the REACH regulation, and such products do not release any chemical substances under normal and reasonably foreseeable application conditions; i.e. there is no obligation of registration.

In accordance with Art. 33 of REACH we provide information for all downstream users - attached hereto - as soon as our products consist of more than 0.1 % w/w of substances of the SVHC candidate list (see the table for the respective valid list <http://echa.europa.eu/web/guest/candidate-list-table>).

Furthermore our standard products intentionally do not contain any substances according to Annex XVII (see: <https://echa.europa.eu/substances-restricted-under-reach>) in the application and over the concentrations defined therein.

Thorsis Technologies is committed to meeting its legal obligations under REACH. Thorsis Technologies will continue to work with its suppliers and customers as we implement the regulations.

We trust that this letter will answer your questions. Should you require further information, please contact your local Thorsis Technologies Sales Office (see www.thorsis.com for contact information).

With kind regards



Dipl.-Ing Thorsten Szczepanski
Managing director

Attachments:

- Recapitulation of the regulations of REACH
- Customer Information on REACH

Recapitulation of the regulations of REACH (EC Regulation 1907/2006)

1. REACH is a new European Union regulation concerning the Registration, Evaluation, Authorisation and restriction of Chemicals. It came into force on 1st June 2007. A major part of REACH is the requirement for manufacturers or importers of substances to register them with a central European Chemicals Agency (ECHA). REACH applies to substances manufactured or imported into the EU in quantities of 1 tonne per year or more.
2. REACH requires manufacturers and importers of a substance on its own or in a preparation to communicate how their substances or preparations can be used safely for humans and environment. The main instrument for this communication down the supply chain is the Safety Data Sheet (SDS). The manufacturer, importer or downstream user will prepare the SDS according to a similar principle as he did before REACH came into force. The main difference is that when required, the SDS will also have an annex including exposure scenarios specifying the conditions under which the substance or preparation can be used safely, for uses that have been identified. The quality of the SDSs is expected to improve due to REACH as more information will be available as a result of the registration process.
3. Suppliers of articles shall inform their customers about substances of very high concern contained in concentrations above 0.1%. Also consumers can request such information.
4. REACH requires all substances that are intended to be released from articles during normal and reasonably foreseeable conditions of use to be registered according to the normal rules, if they are produced or imported in quantities exceeding 1 tonne/year per producer or importer. In addition, all substances included in the candidate list and which are present in articles above a concentration limit of 0.1% weight by weight and above 1 tons per year must be notified to the agency (ECHA).
5. Downstream users have a right to make their use known to the supplier and in doing so have to provide sufficient information to prepare an exposure scenario. This upstream communication will play an important role when a registrant will prepare a chemical safety report, including exposure scenarios if required, as a part of the registration dossier.

Customer information as per Art. 33 (1) of the REACH Directive EC No. 1907/2006

None of our products contain sub-products with an SVHC content of over 0.1 % w/w.