

# Certificate of REACH Compliance

## The Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)

### Definition of REACH

REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals; not only those used in industrial processes but also in products used in our day-to-day lives.

### REACH Regulation

The REACH Directive EC/1907-2006 details chemicals of concern requiring reporting, and the obligations of manufacturers and importers with regard to those chemicals of concern that are contained in products for use in the European Union. It details registration obligations of both manufacturers and suppliers to assure compliance.

### Vanamatic Company Declaration

We certify that all products manufactured by Vanamatic Company fully comply with the requirements of European Union Regulation (EC) 1907/2006 (REACH) and require no reporting:

- Under the structure of the REACH regulation,
  - Vanamatic Company is a manufacturer of “articles\*”, not a manufacturer of “substances” or “preparations”;
  - Our articles do not involve the “intentional release of substances”.
  - Accordingly, there is no registration, pre-registration, or Authorization requirement for the products we supply. ¶132 and Chapter 2 (3.3)
- As to the requirements of Article 33 of REACH, Duty to communicate information on substance in articles, we declare that none of the SVHCs listed in the REACH directive is present in Vanamatic Company’s products or packaging in a concentration equal to or above 0.1%, when produced from non-lead, steels, aluminums, or brasses as specified by customer .
- Vanamatic Company products which are made from leaded steel, aluminum, or copper alloys, as directed by our customer’s purchase order and print, will have lead content above the 0.1 threshold level. In these cases, Vanamatic provides information regarding that content on our written communications to our customer that the product contains lead, as required by Article 33 of REACH.
- Vanamatic Company is a third party manufacturer of articles, and as such has no duty to notify

### Vanamatic Company Commitment

Vanamatic Company commits to performing its due diligence regarding REACH compliance on a continual basis, as both the directive and the substances on the Candidate list (currently at 209 in number) are updated frequently.

To request additional information, contact;



Steve K. Schroeder  
Director of Marketing & Sales

## Appendix A

### REACH Regulation Duty to Report and Latest European Court of Justice Guidance

#### Who must report? What must be reported?

Under Section 7(2) Producers and importers of articles must notify the ECHA to report substances listed on the SVHC Candidate list if both the following conditions are met:

- The substance is present in relevant articles above a concentration of 0.1% wt. by wt.
- The substance is present in relevant articles in quantities totaling over 2200# per year.

Article 33 requires suppliers of articles containing an SVHC above the 0.1% threshold to inform the recipient of the article, and to provide similar information in response to consumer inquiries within 45 days.

There are three cases when a notification will not need to be required:

- exemption based on exclusion of exposure
- exemption for substances already registered for that use.
- the duty to notify does not extend to articles made by third parties, even if the producer used that article as a component in a complex product. {{ECJ interpretation of article 7(2) }}

#### Latest Developments: September 2015 European Court of Justice Guidance

The latest changes in REACH from the European Court of Justice hold that

- An importer of an assembled product must determine whether any of the components that make up the product exceed thresholds for reporting.
- Component suppliers now need to provide information on SVHC downstream “through to the final customer.”

As a manufacturer of Article components for sale into the European Union, Vanamatic Company commits to performing its due diligence regarding REACH compliance and notifying its customers -as to the REACH Status of the component Article products that they purchase from us.