

April 5, 2023

REACH Position Statement: EU Regulation (EC) Number 1907/2006

Background

The Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) is a European Community Regulation related to the safe use and identification of chemicals (Regulation (EC) Number 1907/2006). REACH entered into force on June 1, 2007, with the aim of improving the protection of human health and the environment through better and earlier identification of the intrinsic properties of chemical substances. REACH was aimed at streamlining and improving former European Union chemical legislation by replacing approximately 40 individual pieces of legislation and harmonizing with the remaining legislation. The new legislative framework under REACH shifts responsibility for the control and safety of chemicals from government authorities to industry and created the European Chemicals Agency to act as a central coordinator.

Acromag Responsibilities

Acromag is an importer of articles as defined in the Regulation. However, registration requirements under Article 7 of REACH do not currently apply to articles imported by Acromag into the European Union because:

1. Substances are not present in the articles in quantities totaling over one ton per year.
2. Substances are not intended to be released under normal or reasonably foreseeable conditions of use.

Acromag is not categorized as a downstream user under REACH because it does not use the substances during its professional activities and therefore has no applicable requirements under Article 37 of REACH. Acromag will continue to monitor REACH developments and will comply with any applicable requirements.

As Substances of Very High Concern (SVHCs) are added to Annex XIV of the Regulation (Authorization List), Acromag will assess whether both of the following conditions are met:

1. The substance is present in the articles in quantities over one (1) ton per year.
2. The substances are present in Acromag devices above a concentration level of 0.1% w/w

Acromag shall comply with the requirements of Article 7(2) and Article 33 of the Regulation, as necessary. For informational purposes, Acromag has contacted its material and manufacturing vendors to verify that Acromag devices do not contain SVHCs per the REACH Candidate List Table – 233 substances as of January 17, 2023. (Note that several vendors have not established a REACH compliance statement yet. Acromag is surveying vendors to determine their status and will continue to do so).

Further information on REACH Candidate List Table can be obtained at:

<https://echa.europa.eu/candidate-list-table>

General inquiries in relation to REACH can be directed to Acromag Technical Support by calling 248-624-1541.

Revision History

The following table shows the revision history for this document:

Release Date	Version	EGR/DOC	Description of Revision
16 SEP 2021	A	CAP	Initial Acromag release.
22 MAR 2022	B	CAP	Update for new substances per the REACH Candidate List Table – 223 as of January 17, 2022. Added revision history.
26 JUL 2022	C	CAP	Update for new substances per the REACH Candidate List Table – 224 as of June 10, 2022.
5 APR 2023	D	CAP	Update for new substances per the REACH Candidate List Table – 233 as of January 17, 2023.