

REACH Regulation Policy Statement

(Registration, Evaluation, Authorization and Restriction of Chemicals)

This statement confirms that Flambeau Inc. is aware of the requirements of REACH Regulation (EC) No 1907-2006 of the European Parliament and of the Council of 18 December 2006. As of 16 July 2019, the ECHA had identified 201 “candidate” Substances of Very High Concern (SVHC).

It is Flambeau’s intention to comply with the requirements of this regulation as it applies to producers of Articles. We continue to work with our suppliers to identify if any SVHC components are contained in the materials procured for use in manufacturing our products.

What is an article?

The meaning of an “article” is defined in Article 3 (3):

- **Article:** means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition;

The function of an article is determined by the intended use and purpose of the article as this is identified by the supplier of the article. The function is also determined according to the expectations determined by the buyer of the article.

Duty to communicate information about the chemicals in the products to the ECHA applies according to Article 7 of REACH.

- Article 7 (1) requires Producers and Importers of products to register with the ECHA chemical substances that are intentionally released from the products during use.
- Article 7 (2) requires Producers and Importers of products to notify the ECHA of the content of Substances of Very High Concern (SVHC’s) if the concentration of SVHC is above 0.1” weight by weight (w/w) and the total amount put on the EU market by the subject company is more than 1 ton per year.

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