

Curtis Industries

FREQUENTLY ASKED QUESTIONS ABOUT REACH COMPLIANCE

1. What is REACH?

Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 is commonly referred to as REACH. REACH stands for the Regulation for Registration, Evaluation, Authorization, and Restriction of Chemicals. The REACH Regulation entered into force on 1st June 2007 to streamline and improve the former legislative framework for chemicals of the European Union (EU) and European Economic Area (EEA) countries.

2. What is the ECHA?

REACH created the European Chemicals Agency (ECHA) which has a central coordination and implementation role in the overall regulation process. ECHA is located in Helsinki, Finland and manages the registration, evaluation, authorization and restriction processes for chemical substances to ensure consistency across the countries in which REACH applies.

3. What is the main objective of REACH?

The main objective of REACH is to improve protection of human health and the environment from the risks of chemicals.

4. Why is Curtis Industries offering REACH compliant articles to its customers?

Curtis Industries has implemented a REACH compliance program to address the legislation initiated by regulatory groups around the world who have called for companies to make changes to manufacturing processes and components so as to address these health and environmental concerns. Curtis Industries is committed to meeting the requirements of all applicable REACH laws and regulations.

5. Is REACH compliance mandatory throughout the world?

REACH compliance is only mandatory on products produced in or shipped into the European Union (EU) and member countries. However, since many other jurisdictions have similar or pending legislation and manufacturers' products may eventually find their way into the EU, REACH compliance is having a global effect.

6. Is Curtis Industries impacted by REACH pre-registration obligations?

Curtis Industries does currently neither manufacture nor import any chemical substances into the EU on their own or in articles in quantities of 1 tonne or more per year. In addition, imported Curtis Industries articles do not contain chemical substances intended to be released during the normal and reasonably foreseeable conditions of the product's use as defined by the REACH regulation and existing guidance. Thus, Curtis Industries does not currently have a direct REACH obligation to pre-register substances.

7. Who does REACH regulation apply to?

Any organization producing, importing, using or placing a substance, mixture or article on the EU market will be responsible for ensuring that it is in compliance with REACH regulations. The legislation covers EU manufacturers, including chemical suppliers, distributors and downstream users, as well as any EU companies importing products to the EU market.

8. Is Curtis Industries working in conjunction with its suppliers to offer REACH products compliant to the REACH regulation?

Curtis Industries is working in concert with several suppliers in an effort to offer REACH compliant products. Curtis Industries is implementing processes and procedures with its suppliers and customers to offer REACH compliant components and assemblies.

9. Where can I find the current REACH legislative information and technical guidance?

You can find additional information about REACH legislative and regulation from the below sources.

ECHA - European of Chemical Agency

EEA - European Environment Agency

EUR-Lex - European Law

10. What is a Substance?

The term "substance" refers to all chemicals, including metals. REACH applies to substances in mixtures, as well as certain substances contained in articles (Components and Assemblies).

11. What are substances of very high concern (SVHC)?

Substances of very high concern (SVHC) are substances identified by the European of Chemical Agency (ECHA) as having hazardous properties. These substances must be regulated because the effects they have on the environment and humans are serious and often irreversible. The SVHC include substances which are carcinogenic, mutagenic or toxic according to the criteria in Annex XIII of the REACH regulation.

12. What is the Candidate List?

The Candidate List is a list of substances of very high concern (SVHC) that are identified as potential targets to be regulated for use within the EU by the process of authorization. This is the letter "A" in the acronym REACH. Substances are added to the Candidate List by ECHA. Any substance included on the Candidate List may ultimately be added to Annex XIV of the REACH regulation by decision of the European Commission. The identification of a substance as a SVHC and its inclusion in the Candidate List is the first step of the authorization procedure.

13. What is Annex XIV of the REACH regulation?

Substances on the Candidate List may subsequently become subject to authorization. The Annex XIV of the REACH regulation is a list of authorized substances. This list of authorized substances means companies using or importing these substances into the EU must be authorized by the regulators for their particular use.

14. How many substances were initially placed on the Candidate List?

Effective October 28, 2008, fifteen (15) substances were initially placed on the Candidate List.

15. Will new substances be added to the Candidate List?

The Candidate List published on the ECHA website is regularly updated when more substances are identified as SVHC by the ECHA.

16. What is Curtis Industries' definition of an Article?

Curtis Industries' definition of an article is a finished and saleable Component or Assembly.

17. What is Curtis Industries' definition of a Component?

Curtis Industries' definition of a component applies to a product containing one part only.

18. What is Curtis Industries' definition of an Assembly?

Curtis Industries' definition of an assembly applies to assemblies of more than one Component.

19. What are the specific amounts permissible of SVHC banned by the REACH regulation?

The permissible maximum amount of any SVHC is 0.1% (by weight per Article).

20. What is Article 33 of the REACH regulation?

Article 33 is a section of the REACH regulation that outlines supply chain responsibilities. In accordance with Article 33, Curtis Industries is obligated to inform recipients of articles that contain any of the chemicals on the SVHC Candidate List that are above the 0.1% concentration.

21. When is a Curtis Industries component or assembly classified as REACH Compliant?

A Curtis Industries component or assembly shall be classified as REACH compliant when it does not contain specific SVHC beyond the specified concentration limits of less than 0.1% (weight by weight) as outlined in REACH 1907/2006/EU regulation.

22. How can I obtain a Curtis Industries REACH compliance statement from Curtis Industries?

A Curtis Industries REACH Compliance Statement may be requested by contacting your Curtis Industries Sales Representative, or by contacting the Company directly at 800-657-0835.

23. How can a customer distinguish between a REACH compliant product and a product that is not REACH compliant?

The Curtis Industries Certificate of Conformance indicates if the component or assembly is classified as REACH compliant.

24. Will Curtis Industries discontinue any products as a result of REACH?

Curtis Industries has no plans to discontinue products as a result of meeting the REACH regulation requirements. Products will be discontinued or changed via Curtis Industries' standard product lifecycle processes.

25. Does Curtis Industries have a special component or assembly marking scheme for REACH compliant products?

At present, there are no legislated REACH requirements for individual part marking to indicate REACH compliance. Curtis Industries does not have any special component or assembly marking scheme for REACH compliant products at this time.

26. Does Curtis Industries have a special REACH labeling method for shipment packaging of REACH compliant products?

At present, there are no legislated REACH requirements for component or assembly packaging to indicate REACH compliance. Curtis Industries has no special labeling method for the packaging of REACH compliant products.

27. Are there any changes required in component or assembly storage conditions of REACH compliant products?

There are no changes in the storage condition specifications. Upon receipt of Curtis Industries products, it is always good manufacturing practice to store components and assemblies in a controlled environment so as not to expose them to extremes of humidity and temperature for extended periods of time.

28. If the REACH regulation only mentions a limited list of substances, why are some companies interested in concentration levels of other substances?

Some companies may have their own internal substance control requirements that exceed the REACH regulation. If your company has additional substance requirements beyond the currently published REACH SVHC substances, please contact our REACH Compliance Team.

29. Who at Curtis Industries is coordinating the company's REACH compliance effort?

A Curtis Industries REACH compliance team has been established and meets regularly to coordinate all REACH company policy. This team coordinates all REACH tasks with respect to our manufacturing locations, qualified subcontractors, and material declarations.

30. Who do I contact if I have additional technical questions about Curtis Industries REACH compliance program?

If you have additional technical questions about Curtis Industries REACH compliance program, contact your Curtis Industries Sales Representative, or the Company directly at 800-657-0835.