

## 1. What is REACH?

REACH is a European regulation on chemicals aimed at their safe use. It stands for Registration, Evaluation, and Authorization of Chemicals. It replaces numerous EU laws related to chemicals and is complementary to other environmental and safety legislation. This legislation was approved by the European Parliament and its Council on December 18, 2006 and formally published in the EU official journal on December 30, 2006. Its purpose is to assure that the use of substances and their impact on different aspects, i.e. health, environment, etc. are appropriately evaluated. It places the responsibility for the safety of chemicals on manufacturers, importers and downstream users and therefore requires registering those substances and providing information on how to use them safely throughout the supply chain.

## 2. The classification of heat shrinkable products in REACH

According to the description in REACH 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 its chemical composition.

Heat shrinkable products hereunder include heat shrinkable tubing, heat shrinkable molded parts, heat shrinkable sheet and heat shrinkable tapes. These products play their key role in insulation and mechanical protection by their specific shapes and thus they are considered as articles.

## 3. Will DNT and Manufacturer of heat shrinking tubings pre-register and register its products ?

According to the description in REACH Article 7(1):

The registration requirement applies to substances in articles for which all the following conditions are met:

1. the substance is intended to be released during normal and reasonable foreseeable conditions of use; and
2. the total amount of the substance present in the articles exceeds one tonne per producer or importer per year; and
3. the substance has not yet been registered for that specific use.

As article, heat shrinkable products do not release any substances in their application conditions and thus pre-registration and registration is not required.

## 4. Will DNT and Manufacturer of heat shrinking tubings pre-register and register its raw materials?

Heat shrinkable products are considered as articles and they are made from varieties of substances. Therefore, DNT and Manufacturer of heat shrinking tubings is a Downstream User of substances.

We have contact with all of these substances supplier to push the process of pre-registration and registration of the substances they produce in case of requirement.

## **5 . Does DNT and Manufacturer of heat shrinking tubings need to notify SVHC to European Chemicals Agency (ECHA) when they present in our products ?**

SVHC means Substance of Very High Concern.

Article 7 of REACH details the criteria under which a SVHC would need to be notified to the European Chemicals Agency (ECHA) if it is present in an article (product).

In summary, notification would be required if:

- (a) the SVHC substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year, and;
- (b) the SVHC substance is present in those articles above a concentration of 0.1 % weight by weight (of article).

If, however, one or both of the following conditions are met, no notification is required:

- The producer or importer can exclude exposure of the substances to humans or the environment during normal or reasonable foreseeable conditions of use including disposal
- The substance has already been registered for that use according to Article 7(6)

According to the latest information, the so called "candidate list" will be published on the ECHA website towards the end of this year or, more likely, early next year. The newly published Candidate' list include 16 substances which are surely not contained in our products. Upon list of whole SVHC substance available, we will check and make our decision of notification or not.

## The Actions of DNT and Manufacturer of heat shrinking tubings against REACH

