
Regulation (EU) No. 1907/2006 (REACH, Registration, Evaluation, Authorisation and Restriction of Chemicals); United Nations Globally Harmonised System (UN GHS); and WFD, Waste Framework Directive (EU) 2008/98/EC, Article 9(1)(i) as amended by Directive (EU) 2018/851 of 30 May 2018, and their national implementations

We hereby certify that we are well informed about the REACH regulation, which entered into force on 1 June 2007 and have determined the applicable consequences and obligations, especially pre registration and registration of substances, notifications to public bodies, authorization, and restriction. We manufacture "articles" as defined in the REACH Regulation Article 2. As a result, we are a "downstream user" in most cases. We do not produce any substances or mixtures that we sell.

Concerning the registration of the relevant substances we use to manufacture our products, we can inform you based on REACH Article 10 that, on the basis of the information presently available to us, we do not currently reach the threshold of one ton per year. It is possible for us to provide more precise data if required.

Concentration of SVHC (substances of very high concern) in ARCA Regler Products

We have a duty to communicate information to our customers on substances contained in our products according to Article 33 of the REACH Regulation: ARCA Regler calculates the contents of the substances in every individual article (e.g. nuts, bolts etc.) included in a bill of materials separately, following the judgment by the Court of Justice of the European Union concerning case C-106/14 of 16 October 2015, "Once an article, always an article" (O5A). ARCA Regler refers to a Candidate List of SVHC, that lists up the substances that we report.

These substances are often determined based on the classification of chemical substances and mixtures in the United Nations Global Harmonized System (UN GHS). We implement these systematics in Europe by following the Regulation (EC) No. 1272/2008 (CLP) on classification, labeling and packaging of substances and mixtures, forming a unified approach with the REACH Regulation. Both Safety Data Sheets (SDS, MSDS) for chemicals and chemical mixtures as well as ARCA Regler Material Data Sheets (MDS) for declaring a material and its substance content are prescribed by these regulations, based on an official list.

Compliance with the Candidate List of SVHC for Authorisation

The Candidate List according to Article 59 (1, 10) of Regulation (EC) No. 1907/2006 (REACH) was first published on 1 September 2008. Since then, it is constantly expanded every six months by the European Chemicals Agency (ECHA). The Candidate List is regularly updated around the middle and end of every year. It now comprises of over 200 substances: <https://www.echa.europa.eu/web/guest/candidate-list-table> (in English).

As a result, it is an on-going process to check whether our products contain SVHC in a concentration greater than 0.1% (w/w). We are in close contact with our suppliers as part of this process and we will inform you if we discover that any changes apply to us.

SCIP Database, “Substances of Concern In articles as such or in complex objects (Products)”


As legally requested by the Waste Framework Directive (WFD) since 5 January 2021 and the respective national implementation, ARCA Regler input the necessary data into the European Chemical Agency's (ECHA) SCIP Database: <https://echa.europa.eu/en/scip-database>

This eliminates half-yearly declarations that our goods are not affected by updates of the REACH candidate list every six months.

It is legally only required to communicate the affected articles and (if the need be) their sub-articles to customers if SVHC surpass 0.1 % mass percent in in articles or in separate articles as a part of more complex articles., as specified in REACH Article 33. Also, protective measures against SVHC have to be stated where applicable.

ARCA Regler GmbH

Tönisvorst, 31. January 2023



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