

To whom it may concern April 2019

REACH

REACH - Registration, Evaluation, Authorisation, and Restriction of Chemicals, (EC) 1907/2006, is a regulation of the European Union, entered into force 1 June 2007. The main purpose is to improve the protection of human health and the environment from the risks that can be posed by chemicals.

NCAB Group is a supplier of Printed Circuit Boards (PCBs). According to the REACH regulation, NCAB is defined as an importer and as a supplier of an article, and the PCB as an article.

This statement includes the update of Substances of Very High Concern (SVHC) in the Candidate List dated 15 January 2019, in total 197 substances. Lead was included in the Candidate List on 27 June 2018. PCBs not finished with leaded HASL contain none of the 197 substances on the Candidate List above the concentration limit of 0.1% weight by weight (w/w). PCBs with surface finish leaded HASL (by customer specification), may contain a concentration of lead >0.1% weight by weight (w/w), which is above the limitation stated in the Candidate List. Based on the registration criteria under Article 7(1) and notification criteria under Article 7(2), PCBs from NCAB do not contain any substances that require registration or notification.

Registration according to Article 7(1)

Registration of substances in articles is required when all conditions listed under Article 7(1) of the REACH Regulation are fulfilled:

- The substance is intended to be released under normal or reasonably foreseeable conditions of use.
- The total amount of the substance present in all articles with intended release (i.e. including the amounts that are not intended to be released) produced or imported by one actor exceeds 1 tonne per year.

Notification according to Article 7(2)

Notification of a substance in articles is required from producers and importers of articles when all the following conditions of Article 7(2) are met:

- The substance is included in the Candidate List for authorisation, and
- The substance is present in articles produced and/or imported above a concentration of 0.1% (w/w), and
- The total amount of the substance present in all articles produced and/or imported, which contain more than 0.1% (w/w) of the substance, exceeds 1 tonne per actor per year

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 (Article 7(3)).
- The substance has already been registered for that use according to Article 7(6).

Source: Guidance on requirements for substances in articles by ECHA (European Chemical Agency)

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