

Compliance with REACH – EC regulation nr. 1907/2006

On 1st June 2007 has become effective the EC Regulation nr. 1907/2006 REACH (Registration, Evaluation, Authorization and Restriction of Chemicals), that regulates production and trading of chemical substances inside the European Community.

The Regulation foresees that all chemical substances as such, or components of a preparation or of an article, produced or imported in the European Community with quantities equal or more than 1 ton per year shall be pre-registered within 30/11/2008 and further on registered, within the fixed deadlines, at the European Agency for Chemical Substances (ECHA) established in Helsinki.

By the present letter we are informing you that P. Lemmens Co qualifies, according to the REACH regulation, as “Downstream User” (art. 3, paragraph 13) for incoming raw materials used in production activities and as “Producer of Articles” (art. 3, paragraph 4) for finished products, where it can be intended as for article (art. 3, paragraph 3)., according to the regulation itself, any product, component or semi-finished product

P. Lemmens states that:

- Articles supplied to you, as electrical motor and ventilation unit are not subject to instructions given by REACH regulation as such, neither can they be qualified as “articles that intentionally release substances” (art.7 paragraph 1.b.) (the only case of articles subject to REACH, concerns the case where the article itself incorporates substances intended to be released in normal or reasonably foreseeable conditions of use and that such substances be not yet registered for that specific use; this case does not affect products supplied).
- P. Lemmens is not qualifiable, actually, as producer/importer according to REACH regulation and so is not required to pre-register/registrate substances used in his production processes.

P. Lemmens has undertaken all necessary activities to comply with the applicable instructions of REACH regulation, particularly:

- Set up of communication channels with the upstream supply chain to verify that substances used will be pre-registered/registered by the relevant importers and producers and to assure that the specific use of P. Lemmens be inserted into the registration file and possibly into the exposure scenario (if foreseen).
- P. Lemmens is also taking precautions in order to assure that actuation of regulation does not bring any negative impact on manufacture of products supplied to you, in individuating and evaluating possible alternative suppliers.
- Evaluation of substances used into the articles supplied to you to identify and inform you on possible presence, according to art. 33 of REACH regulation, of substances that will be classified as SVHC and included in the “Candidate List” with a concentration over 0.1% weight/weight (w/w).

The “Candidate List” has been published on the site of the European Agency for Chemical Substances (ECHA) and will be constantly updated. For further information, we recommend the web site of the European Agency for Chemical Substances (ECHA):

http://echa.europa.eu/chem_data/candidate_list_table_en.asp

Gembloux, 2020/03/19

Ir. Gauthier Nélis

