

Taconic Sp.z.o.o. – Al Milenijna 14 – PL 66 470 Kostrzyn n/O

**Date:**

26<sup>th</sup> January, 2021.

**Reference:**

REACH and RoHS Legislation

**Products:**

All articles produced by Taconic International Limited.

**Reference:**

1. REACH Regulation **EC1907/2006**, including EU Regulation 830/2015.SCIP
2. EU Regulations 2017/1000 amending Annex XVII of EU Regulation 1907/2006.
3. EU Regulation 2020/171 amending Annex XIV of EU Regulation 1907/2006.
4. EU Regulation 2011/65/EU RoHS, including EU Directive **2015/863(RoHS 3)** which amends Annex II of EU Regulation 2011/65/EU. Also incorporating EU Regulations 2002/95, 2003/11, and 2005/59.
5. California Proposition 65.
6. 3TG.

I wish to make declarations on the above referenced subjects as follows:



## 1. REACH Regulation EC 1907/2006 and 830/2015. SCIP.

All products manufactured and supplied by Taconic International Limited, and supplied to our customers, are defined as articles under the REACH regulations. No substances are intentionally released as a result of using our articles in accordance to recommended specifications. We are considered by the above referenced legislation to be downstream users of substances.

As a consequence, we have been in contact with all our suppliers to ensure that they have evaluated products supplied to us with REACH in order to ensure that there is no uninterrupted supply to our production process.

The list of pre-registered substances has been available on the 1<sup>st</sup> January, 2009 via the ECHA website. We have checked that all substances used in our preparations and articles are registered with ECHA.

We have studied all the **211** substances in the Candidate List of Substances of Very High Concern(SVHC) for authorisation which has been updated on the ECHA website on the **19<sup>th</sup> January, 2021**, in accordance with Article 59(10) of REACH. We can confirm to you that **none** of the substances on this list are utilised by Taconic International Limited and subsequently are **not** in any products manufactured by the company or supplied to any customers.

The company has evaluated all substances utilised in the manufacture of all articles. This is done by scrutinising all MSDS for all substances, which must comply with both EU



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Regulation 1907/2006 and 830/2015. Compliance to EU Regulation 1272/2008(CLP) must be stated on all MSDS, which are regularly updated to ensure that the most recent copy is scrutinised. None of the substances identified in Part 3,Annex VI of EU Regulation 1272/2008 as carcinogenic, mutagenic or toxic to reproduction(CMR) of category 1A or 1B are in the substances used by Taconic International Limited to manufacture articles.

Therefore, the company is not obliged to submit a SCIP notification which covers all articles placed on the EU market. Our articles do not contain **S**ubstances of **C**oncern **i**n articles as such or in complex **p**roducts containing substances on the ECHA SVHC list above 0.1% w/w.

## **2. EU Regulation Number 2017/1000.**

EU Regulation 2017/1000 amends Annex XVII of EU REACH Regulation 1907/2006 for PFOA,its salts and PFOA related substances. PFOA is listed in entry 68 of Annex XV11. This regulation stipulates that PFOA must be  $\leq 25$ ppb and  $\leq 1000$  ppb of one or a combination of PFOA related compounds.

Our suppliers of fluoropolymer have confirmed that PFOA( CAS Number 335-67-1), or any of its salts, are no longer used in the industry. They have assured us that levels of PFOA are below 25ppb and are therefore compliant with the above legislation. This includes EU Regulations 2020/784,2020/1203 and 2020/1204, which amend EU Regulation Number 2019/1021.

Consequently, Taconic International Limited is in full compliance with this legislation and its manufactured articles are subsequently free from PFAS substances.



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### **3. EU Regulation Number 2020/171.**

EU Regulation 2020/171 amends Annex XIV of EU REACH Regulation 1907/2006. None of the 54 substances listed in this inventory are utilised by Taconic International Limited.

### **4. EU Regulation 2011/65/EU RoHS, including EU Directive 2015/863(RoHS 3) which amends Annex II of EU Regulation 2011/65/EU. Also incorporating EU Regulations 2002/95,2003/11, and 2005/59.**

I wish to confirm that none of the materials of concern in the following EU directives are utilised in our product range and subsequently in product supplied by us to our customers:

- 94/62/EC(Packaging and Packaging Waste).
- 76/769/EC( use of certain dangerous substances and preparations).
- 2011/65/EU(RoHS).
- 2015/863/EU(RoHS 3).
- 2012/19/EU(WEEE). This supersedes WEEE 2002/96/EU.
- 2003/11/EC.(Restrictions on the marketing and use of certain dangerous substances and preparations).



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Our products are subsequently **free from** the following restricted substances:

- **Lead (Pb):** < 1000 ppm
- **Mercury (Hg):** < 1000 ppm
- **Cadmium (Cd):** < 100 ppm
- **Hexavalent Chromium: (Cr VI)** < 1000 ppm
- **Polybrominated Biphenyls (PBB):** < 1000 ppm
- **Polybrominated Diphenyl Ethers (PBDE):** < 1000 ppm
- **Bis(2-Ethylhexyl) phthalate (DEHP):** < 1000 ppm
- **Benzyl butyl phthalate (BBP):** < 1000 ppm
- **Dibutyl phthalate (DBP):** < 1000 ppm
- **Diisobutyl phthalate (DIBP):** < 1000 ppm

Consequently, our products comply fully with China RoHS 2 requirements.

#### **5. California Proposition 65.**

I wish to confirm that the company has studied all the chemicals on the State of California Proposition 65 list which has been updated on the **3<sup>rd</sup> January 2020**. I can declare to you that **none** of the chemicals on this list are in any articles manufactured by Taconic International Limited and supplied to any of its customers.



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## 6. 3TG

Legal Reference : The Dodd-Frank Wall Street Reform and Consumer Protection Act, 2010.

Section 1502(e)(4).

Taconic International Limited does not purchase or utilise any of the following 3TG substances:

- Tantalum(Ta).
- Tin(Sn).
- Gold(Au).
- Tungston(W).

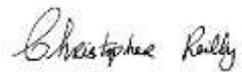
Consequently, the above mentioned materials are not in any products manufactured or sold by our company. Taconic International Limited does not source any of its raw materials directly from the African continent.

Our company has never had and currently has no dealings in areas of conflict which currently are DRC, South Sudan, Rwanda, Tanzania, Uganda, Zambia, Tanzania, Burundi, Angola or Central African Republic. **The company is fully compliant with the above referenced legal requirement which originated in the USA.**



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Yours sincerely,



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Technical Services.

