

REACH and APEM Inc.

The European Union's **Registration, Evaluation and Authorization of Chemicals Regulation**, or REACH, came into effect under EC 1907/2006. This regulation was designed to consolidate the current EU chemical laws into a singular, unified piece of legislation designed to improve control over chemicals that adversely affect human health and/or the environment. This shifts responsibility from the public sector (the government) to the private sector (business). Government oversight will be present in the form of the European Chemicals Agency (ECHA).

REACH applies to all substances manufactured in or imported into the EU. These substances may be in their natural state or as a part of an "article". Under REACH regulations, APEM Inc. is a producer of "articles": switches, switch panels, joysticks, and LED indicators.

For articles imported into the EU, there are primarily two criteria that determine the need for registration and/or notification of the ECHA. The first criterion is that the substance in question must be intentionally released under normal conditions of use. In addition, the substance being released must be present in those articles in quantities totaling over one metric ton per year per producer/importer. The substances present in the articles delivered by APEM Inc. are not intentionally released during normal use and do not total over one metric ton per year per producer/importer. Therefore, these substances do not require pre-registration or registration with the ECHA.

The second criterion applies to Substances of Very High Concern (SVHC). The ECHA published an initial list of 15 substances on October 28th of 2008. Since then the list has been updated with a total of 197 SVHCs, with the most recent addition on January 15, 2019. Any use of these substances will require notification to the ECHA. To the best of our knowledge, the articles supplied by APEM Inc. do not contain any of the substances found on any REACH listing of SVHC.

APEM Inc. will be closely monitoring the REACH directive and will keep you informed of any changes to our REACH compliance status.

Should you have any additional questions, do not hesitate to contact APEM Inc. directly.

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