

June 2024

REACH Declaration of Conformity

In response to an increasing number of customer enquiries about the European REACH Regulation, this letter was developed to identify the measures taken, planned, and implemented in response to the Regulation.

We regularly evaluate the European REACH Regulation. Because of a comprehensive review of this Regulation and the guidance available on the website of the European Chemicals Agency (ECHA), we have defined our responsibilities and actions as follows:

1. The ECHA website (<http://echa.europa.eu/>) regularly publishes lists of additional substances that have been accepted for inclusion in the candidate list of substances of very high concern (SVHC) subject to authorization. We regularly monitor the ECHA website (as of June 27th 2024) for the inclusion of new substances as SVHC to determine if they may be included in our products. We will send the required "notification" according to Article 7 of REACH or "notification" according to Article 33 (2) of REACH if we find that a substance that has been included in SVHC's candidate list is present in our products in an amount of more than 0.1 mass percent (w/w). This "notification" will be in the form that you will receive in our delivery note a corresponding information about this product from which you can see which substance(s) of very high concern (SVHC) on the candidate list (as of June 27th 2024) is/are contained in concentration above 0.1 mass percent (w/w) according to Art. 33(2) of the REACH Regulation (Regulation (EC) No. 1907/2006) and Regulation (EU) 2021/2204 amending Annex XVII to Regulation (EC) No 1907/2006.
2. Our assessment of the presence of SVHC is based on a comparison of the Chemical Abstract Service (CAS) numbers for substances classified as SVHC with a list of CAS numbers we have compiled from MSDS files we have purchased and/or received for the chemicals and relevant materials we use in our products.
3. The EU suppliers of products that are included in our products in relevant are also obliged to inform us without being requested to do so if the products supplied by them contain an SVHC substance above 0.1 mass percent (w/w). If we receive such information from our suppliers and become aware that the 0.1 mass percentage threshold for an SVHC substance is also exceeded in our products, we will inform you by indicating this in the delivery note for the corresponding products.
4. We make separate agreements with all non-EU suppliers of products which are processed in our products in relevant quantities. In this agreement, we are assured in writing that we will be informed immediately if the 0.1 mass percentage threshold for an SVHC substance is exceeded in a product delivered to us.

Yours sincerely, Battery-Kutter



Hendrik Kutter