

Thursday 25th January 2024

UK REACH Regulation Compliance

Regulation, Evaluation, Authorization and restrictions of Chemicals

Dear (Customer),

Assessment of the content of REACH SVHC's from the 23rd January, 2024 candidate list in Clockwork Components (Clockwork) products.

On January 23rd 2024, the European Chemicals Agency (ECHA) published the candidate list of substances of very high concern (SVHC's) as part of the European Union's Registration, Evaluation, and Authorization of Chemicals (REACH) Regulation (Adopted into UK Law, UK REACH). This list of 240 substances can be found at: -

<https://echa.europa.eu/candidate-list-table>

Clockwork are considered as distributors of articles (components) and the products we supply (*) do not intentionally release any substance under normal or reasonably foreseeable conditions of use. (*) Except for propellants and liquid products (Aerosols and otherwise contained liquid products may contain SVHC's that have already been registered and Material Safety Data Sheets (MSDS) are supplied on request).

Furthermore, to comply with Article 33 (1) of REACH, after assessing our products for the use of these substances, Clockwork declares that none of the 240 Substances of Very High Concern listed in ECHA's Candidate List of Substances of Very High Concern (SVHC) as amended accordingly (Annex XIV Authorisation List and Annex XVII Restriction List) are contained in any products which are being supplied to UK Customers, at concentrations greater than 0.1% weight by weight of the finished product.

This statement applies to all currently and historically supplied products and their associated consumables. This conclusion is based on multiple internal and external sources of information such as supplier material declarations, common knowledge of typical uses of these substances, common knowledge of typical uses of these substances in Electrical and Electronic Equipment (EEE), the experience of our own materials experts and product design team, as well as historical product test data.

The above statement however, does not include subassemblies that are a cable, set of cables and/or wires, or consist of mostly insulated wiring and cables. In these cases, the SVHC's listed in the table below may be present at greater than 0.1% weight by weight of the specific part, kit, or subassembly. These substances are widely used as plasticizers in polymers, particularly in flexible PVC, which is commonly employed as insulation for internal and external cabling and wiring throughout the electronics industry. Clockwork is continuing to work both internally and with our suppliers to understand and evaluate opportunities for phasing out these materials.

Substance Name	CAS Number
Dibutyl phthalate (DBP) * ¹	201-557-4
Bis (2-ethy(hexyl)phthalate) (DEHP) * ¹	204-211-0
Benzyl butyl phthalate (BBP) * ¹	201-622-7

*¹ Safe use information: As used in the above applications, no additional safe handling guidance is needed for these substances when articles containing them are used as intended and properly disposed of at end of life.

In accordance with Article 33 of REACH (UK REACH), we can confirm that we will review the (SVHC's) list on a regular basis.

We will communicate / notify you of the presence of any Candidate List substances in our products that we supply above the concentration of >0.1% by weight.

If you intend to alter, modify or change the chemical composition of any article for whatever reason, we recommend that you seek appropriate advice from a Clockwork Management Representative if you are at all uncertain of the effect of any such action.

Yours Sincerely,



Oliver Tattersall.
(Operations Director)