Compliance policy EU Chemicals regulation – REACH

Regulation (EC) No 1907/2006 on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and setting up a European Chemicals Agency provides a comprehensive legislative framework for chemicals manufacture and use in Europe. The legislation applies to all chemical substances: manufactured, imported, sold, used on their own, in mixtures or in products.

NOTE is committed to complying with all regulatory requirements applicable to our business. Under REACH, NOTE has identified the following provisions as particularly relevant for the products we supply:

REACH restrictions in Annex XVII – Annex XVII lays down restrictions on the manufacture, placing on the market and use of certain dangerous chemical substances, mixtures and articles. More information on Annex XVII and the list of restrictions can be found on the European Chemical Agency’s (ECHA) webpage.

REACH Substances of very high concern (SVHC) and information on substances in articles (art 33) – Certain substances have hazardous properties that have serious consequences for human health and the environment. Substances fulfilling the criteria for SVHC classification can be placed on the Candidate list, an official list maintained by ECHA. Substances are continuously added to this list, presently two times per year.

If an article contains more than 0.1 % (weight by weight) of a substance on the Candidate list we as supplier are under a legal obligation to give you as recipient of an article sufficient information to allow safe use of the article including, as a minimum, the name of that substance. This information shall be given even if not requested.

More information on information on substances in articles and the latest version of the Candidate list can be found on ECHA’s webpage.

NOTE’s policy for achieving and maintaining compliance with REACH for existing and new products is based on the following:

- Procurement: NOTE will actively work with our supply chain to ensure that all materials and components used comply with the REACH requirements. We include the requirements in our purchase specifications.
- Corrective and preventive action: NOTE will immediately take any necessary corrective actions in case of suspicion of non-compliance with REACH.
- Legislative Situation: NOTE continuously monitors modifications and amendments of the REACH regulation to ensure compliance with the applicable version.

Where our customers specify items and supplier to be used for the manufacture of their products we will rely on the customer to ensure that the selected items are compliant with REACH, including whether it contains SVHC above the regulatory limit triggering information requirements, unless otherwise agreed.

If the customer needs a more detailed analyze, NOTE can offer further service as a separate project.