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To whom it may concern



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## REACH 235 – Substances of Very High Concern (SVHC)

Dear customers,

we are a manufacturer of electrotechnical products and use chemicals in our manufacturing processes as specified in the REACH Regulation. According to the ECHA, we are therefore a downstream user. To our current knowledge, our products do not contain any chemical substances above the limit values listed in the current Annex XIV of the REACH Regulation, the so-called "candidate list" of ECHA (cf. <https://echa.europa.eu/de/candidate-list-table>). Our products do not release any harmful chemical substances under normal and reasonably foreseeable conditions of use. The few chemical substances that are necessary for the manufacture of our products have either been pre-registered by our suppliers or generally do not have to be registered or declared. Furthermore, we do not use any of the chemical substances listed in Annex XVII of the REACH Regulation above the applicable limits. For this reason, Annex XVII is not part of our risk assessment.

E-T-A products are neither chemical substances nor mixtures of substances, but products. Therefore, registration, evaluation, or authorization according to the REACH Regulation 1907/2006 is not required for our products. Furthermore, the preparation of safety data sheets according to Article 31 as well as according to Annex II, or according to the amendment 2015/830, is not required.

According to our assessments, lead in metallic form (CAS number 7439-92-1) is subject to the information obligation according to Article 33, if it exceeds 0.1 % by mass in our products. Lead is listed as SVHC according to Article 59 (10) of the REACH Regulation on the candidate list of the European Chemicals Agency ECHA. For specific products, exemptions 6a., 6b., 6c., 7a., and 7c. I of the RoHS Directive (2011/65/EU Annex III) apply. Thus, these products are RoHS-compliant but not lead-free.

As a manufacturer of electrotechnical products, we are in close cooperation with our suppliers regarding REACH and actively request related information. At present, we are not aware of any products supplied to us containing chemical substances above the limits specified in Annex XIV or Annex XVII of the REACH Regulation.

Best regards,  
E-T-A Elektrotechnische Apparate GmbH

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