

January 2020

Position on REACH

Candidate List (SVHC) and Restrictions List

Kramp supports the objective of the REACH Regulation (Registration, Evaluation, Authorization and restriction of Chemicals, 1907/2006/EC) to improve the protection of *human health* and the *environment* from the risks that can be posed by chemicals and to promote alternative methods for the hazard assessment of substances in order to reduce the number of *tests on animals*.

Applicable products

In principle, REACH applies to all chemical substances; not only those used in industrial processes but also in our day-to-day lives, for example in cleaning products, paints as well as in articles such as clothes and electrical equipment. Therefore, the REACH regulation has an impact on most products sold across the EU.

Obligations Candidate List

Depending on the role, companies can have multiple obligations for substances in products, articles as the REACH regulation identifies them, as indicated in the table below.

	Registration of substances in articles to ECHA	Notification of substances in articles to ECHA	Communication of information on substances in articles to recipient or consumer
Legal basis in REACH Regulation	Article 7(1)	Article 7(2)	Article 33
Actors concerned	article producers and article importers	article producers and article importers	article suppliers
Substances concerned	substances intended to be released from articles	substances included in Candidate List ¹	substances included in Candidate List

Kramp is article supplier and therefor bears the obligation of communication as indicated in article 33 of the REACH Regulation.

The information is to be provided

- a) to the recipient of the article when the article is supplied for the first time after the inclusion of the substance into the Candidate List; and
- b) to the consumer upon request by that consumer, within 45 calendar days of that request and free of charge.

No SVHC, no communication obligation

The communication obligations arise from the presence of the Candidate List substance in the article. This means that whenever there is no presence of a substance in the Candidate List, there are no communication obligations.

Obligations Restrictions List

The obligations of Kramp under the REACH Restrictions List (Annex XVII) depend on the interpretation of each specific entry in the list for the substance concerned, taking account of the wording, the context and the purpose of the restriction in question. For instance, if a substance were completely banned, then Kramp will not place it on the market.

¹ In this document "Candidate List" means "Candidate List of Substances of Very High Concern (SVHC) for Authorisation".

Process

Kramp has set up a process to ensure REACH compliance among its suppliers. Responsibilities and appropriate measurements have been defined and implemented to enable Kramp to comply with the the REACH obligations related to articles and mixtures. Knowledge of the substances in our products is based on information provided by our suppliers, third parties and test laboratories. Kramp will make all reasonable efforts to ensure appropriate and timely handling of updates of the REACH.

What does this mean for you?

Whenever you buy an article from Kramp of which Kramp is aware it contains a Candidate List substance in a concentration above 0.1% weight by weight of that article, Kramp will inform you the presence of that substance by providing you with the name of the substance in question and, where necessary, all other information that is needed for the safe use of the product. Next to that, Kramp will make sure the products it supplies to its customers are also compliant to the restrictions as laid down in the Restrictions List (Annex XVII).

We trust that the above will satisfy your needs.

In case you have any questions or remarks, please do not hesitate to contact us via your sales representative.

On behalf of
Kramp Groep B.V.



Mario Babic
Chief Commercial Officer