

5th May 2020

RE – REACH Compliance Statement

The letter provides the compliance status of Itac Ltd products with the following directive(s) or regulation(s):

Product/Article Declaration

REACH (EC 1907/2006)

Background

The acronym REACH stands for the “**R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **CH**emicals”. REACH is a European Union Regulation (No 1907/2006) which was entered into effect in June 2007. REACH is intended to improve the protection of human health and the environment through the identification and use of certain chemicals and chemical substances.

Itac Ltd is a formulator of adhesives and coatings and is considered a “Downstream User” of chemical substances by REACH regulatory definition. REACH (EC1907/2006) Chapter 2, Article 3 defines a Downstream User as “a legal person established within the Community, other than the manufacturer, or the importer who uses the substance, either on its own or in a preparation, in the course of his industrial or professional activities”. In addition to being a Downstream User, Itac Ltd products are incorporated and used as ingredients/raw materials into “article(s)”. REACH considers the term article(s) as “object(s) which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition”.

As a Downstream User formulating products utilised in the production of articles, we are reliant on our upstream suppliers for the pre-registration / registration of our raw material chemical substances used in our production process.

Substances

Through REACH, The European Chemical Agency (ECHA) publishes an updated list periodically of chemical substance candidates considered to be “Substances of Very High Concern” (SVHC) through regulation. Articles containing SHVC’s at greater then or equal to 1% by weight may be subject to reporting.



Itac Ltd does not perform analytical testing on our products to determine any presence of SVHCs. Itac Ltd bases its' knowledge on information provided by third parties. To the best of our knowledge the SVHCs. published on the ECHA candidate list are not intentionally or knowingly used as ingredients at concentrations of 1% or greater in products manufactured by Itac Ltd. These substances are not expected to be present above the regulated threshold limits and our manufacturing processes are not expected to introduce or create these substances.

Steve Farnworth
Managing Director