

# **Technical Declaration**

## **Declaration on REACH compliance**

Dear business partner,

This is to inform you about the actions and processes that FHCS undertook in order to ensure the legal compliance of our products with the European Union Chemicals Legislation REACH (1907/2006/EC).

#### A. Products seen as "article" under REACH which do not need legal reevaluation

The majority of products of the Vileda <sup>®</sup> Professional portfolio – except the products listed under section B. – are to be seen as "articles" under the new European legislation for chemicals and therefore do not need any legal reevaluation.

Since articles have not to be registered under REACH but only substances, our duty is to make sure that all the articles and substances we purchase are conforming to REACH regulation.

We are in close contact with our suppliers in order to assure that the substances contained in our products are registered for our applications, securing a stable supply chain.

#### B. Products seen as "article with intended release" under REACH

Under REACH regulation, articles do not have to be registered but only substances. This is valid for producers and importers of substances and also for imported articles with intended release.

Currently, our portfolio does not contain imported articles with intended release. A registration is therefore not required.





### C. SVHC – Substances of Very High Concern

Substances of very high concern are defined in Article 57 of REACH regulation (1907/2006/EC) and include hazardous substances which are e.g. mutagenic, carcinogenic or toxic-to-reproduction. All our raw materials and third party products are screened on SVHC (Substances of Very High Concern) according to the candidates list of the ECHA (European Chemicals Agency) and additionally according to internal Freudenberg regulations.

We stay in contact with our suppliers and require them to keep us informed about the compliance with REACH requirements. Likewise we meet the obligations of the duty to communicate information about SVHCs in articles.

To our current best knowledge, none of our articles does contain any SVHCs in amounts larger than 0.1 % (w/w) – therefore, there are currently no obligations to inform customers or to answer according consumer requests.

Nevertheless, we are aware about the biannual update of the SVHC list by ECHA and we monitor new additions for their relevance for FHCS and our products.

#### D. FHCS-internal REACH organization

As a "Downstream User" it is our duty to ensure compliance with REACH regulation concerning all substances we use in production including the production process itself.

In case of purchased products, we have to assure that these products exclusively contain substances which are conforming to REACH regulation.

26th June 2018

