

Control Techniques Dynamics REACH position statement

In accordance with the requirements of European Regulation 1907/2006 Control Techniques Dynamics have been actively seeking assurances from our supply chain to ensure continued supply.

Under the regulations which came into force June 1st 2007 there has been a requirement for chemicals produced and imported into the European Community in a volume of > 1 tonne per annum to be registered, evaluated and authorised for use.

The first stage of the approval process for chemicals was for them to be registered with the newly formed European Chemical Agency (ECHA)

The regulation defines responsibility for the registration of chemicals to be by the producer or importer and goes on to use three pieces of terminology to further clarify these being:-

Substances, Preparations and Articles.

Substances are the chemicals elements in their natural state

Preparations are a mixture of 2 or more substances

Articles are finished items produced as part of a process, which can contain substances and or preparations.

Under the regulation Control Techniques Dynamics is defined as a producer of Articles and as such we have no responsibility under the directive to register. We do have however responsibility to ensure that we notify our suppliers that we use certain Substances & Preparations within our articles and also to inform our customers if any of our articles contain substances of very high concern.

Control Techniques Dynamics have declared that no substances are released from our articles under normal operating conditions.

Pre registration was allowed up to 31st December 2008, after this date any chemicals not registered will need to go through the full approval process.

The ECHA will next determine the evaluation period for each of the anticipated "30,000" chemicals believed to be in use across the EU.

The evaluation period will vary depending on the current risk rating of the chemical. Those known to be substances of highest risk will carry the shortest evaluation period up to 2018 for the least risk substances.

The ECHA will publish on their web site (www.echa.europa.eu) a full list of substances and their evaluation period.

<http://apps.echa.europa.eu/preregistered/pre-registered-sub.aspx>



The next stage of the evaluation process is to identify preparations and articles which may contain Substances of Very High Concern (SVHC). These are substances which have been proven or are believed to be Carcinogenic, Mutagenic and Toxic.

Again the ECHA have published a list of these on their website.

http://www.echa.europa.eu/chem_data/candidate_list_en.asp

Under article 17 of the regulation Control Techniques Dynamics have a responsibility to inform our customers that articles supplied contain SVHC's.

This will be done after evaluation of our articles with the assistance of our supply chain. Assurances are being sought from the entire supply chain about the status of each and every substance or preparation procured.

This is a momentous task added by identifying those that carry the greatest risk of containing SVHC's and so we ask for your patience whilst we carry out this work.

Control Techniques Dynamics fully support the aims of the regulation and will keep customers informed of progress and of course notify them immediately should SVHC's be identified in the articles supplied to them.



Ian Hunt
Quality Manager

30th April 2009

