Dear Valued Customer:

This letter provides the compliance status of Epoxy Technology, Inc.’s (EPO-TEK®) products with REACH (EC 1907/2006), SVHC list (June 25, 2020).

Background

The acronym "REACH" stands for the "Registration, Evaluation, Authorization and Restriction of Chemicals". 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.

Epoxy Technology, Inc. is a formulator/blender of epoxy resin, urethane, silicone, polymers/compounds and considered a "Downstream User" of chemical substances by REACH regulatory definition. REACH (EC 1907/2006) 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 a 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, EPO-TEK® 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 utilized in the production of articles, we are reliant on our upstream suppliers for the preregistration/registration of our raw material chemical substances used in our production processes.

Substances

Through REACH (EC 1907 /2006), 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 SVHCs ≥ .1 % by weight may be subject to reporting.

More information regarding REACH (EC 1907/2006) and SVHCs as established on the ECHA candidate list can be found through the following link: https://echa.europa.eu/candidate-list-table.

EPO-TEK® Products

Epoxy Technology, Inc. does not perform analytic testing on our products to determine any presence of REACH SVHCs. Epoxy Technology, Inc. bases its knowledge on information provided by third parties and believes it to be true. To the best of our knowledge, unless listed below, the SVHCs published on the ECHA candidate list (https://echa.europa.eu/candidate-list-table) are not intentionally or knowingly used as ingredients in products manufactured by Epoxy Technology, Inc. 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.
The following EPO-TEK® products contain REACH (EC 1907/2006) Regulated "Substances of Very High Concern" (SVHC) in concentrations greater than permissible threshold levels:

SVHC: 4-Nonyl Phenol, branched and linear (CAS Number: 84852-15-3)
   EPO-TEK® 302
   EPO-TEK® 302-3M
   EPO-TEK® MED-302-3M
   EPO-TEK® OJ2145

EPO-TEK® OJ2145-1
EPO-TEK® OM125
EPO-TEK® OM125-1
EPO-TEK® OM125-LV

SVHC: Octamethylcyclotetrasiloxane (CAS Number: 556-67-2)
   EPO-TEK® AP-100

We appreciate your business.

Sincerely,

Jeffrey Sargeant
Technical Director
Epoxy Technology, Inc.

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