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REACH

September 2020

REACH – Chemical regulation in the EU

As of 1 June 2007 a EU ordinance (EU 1907/2006) for the Registration, Evaluation, Authorisation and Restriction of Chemicals - called REACH - has come into effect, with elementary changes on the existing regulations on chemicals in Europe. Solely for the implementation of the requirements the European Chemicals Agency (ECHA) was established in Helsinki and started operations as of 1 June 2008.

The declared aim of REACH is to improve the level of knowledge about the dangers and risks that chemicals may pose, to achieve a higher protection level for man and environment. REACH affects all chemicals, as well those which are in use for a long time. Moreover, REACH will shift the responsibility for the risk assessment of chemicals in large part from the authorities to the producers and importers.

In the centre of the new ordinance is the registration and evaluation process, in which communication within the supply chain is playing an essential role. Nearly all companies in the supply chain, like producers, importers, downstream users, are affected by REACH and have to fulfil particular obligations.

The entire implementation of REACH lasted more than 10 years. The timetable set by REACH included a pre-registration phase running from 1st June 2008 to 1st December 2008. The schedule for the following registration was depending on the production volume and risk potential of the particular substances. Until 1 July 2018 all substances were supposed to be registered.

Substances of Very High Concern (SVHC) according to Annex XIV of the REACH ordinance are required to be approved separately and may be subject to restrictions on use. A first list of substances with such properties ("candidate list") was already issued by ECHA on 28.10.2008 followed by additional listings since then.

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As leading manufacturer of sanitary faucets and systems we have been closely engaged since the beginning with the new requirements.

Hazardous substances, chemicals

As we are neither producing chemicals or mixtures nor importing them to the EU, we are only affected by REACH as a so called "Downstream User". Registration obligations are inapplicable for us.

In this position, we depend mainly on the activities of our suppliers for securing our future supply with chemicals and mixtures. For this we are in close contact with our suppliers; this includes regular requests and confirmations on compliance with REACH requirements, too.

Products

Substances of Very High Concern (SVHC) according to the "candidate list" for Annex XIV of the REACH ordinance (current status: 07.07.2020 - 209 substances), are not included in our products (≥ 0.1 % per substance and product) with five exceptions.

These exceptions are lead, PFOA and DEHP, EGDME and N,N-dimethylacetamide:

Lead (CAS Number 7439-92-1 / EINECS 231-100-4) is on the "candidate list" since 27.06.2018. In our products, lead is being applied as alloying constituent in non-ferrous metals (e.g. brass) respectively components made of non-ferrous metals in concentrations > 0,1 %.

Perfluorooctanoic acid (PFOA) (CAS Number 335-67-1 / EC Number 206-397-9) is on the "candidate list" since 20.06.2013. In our products, PFOA is currently being detectable in the membranes of the Rainshower2Jet series in concentrations > 0.1%. A change is in progress.

Bis (2-ethylhexyl) phthalate (DEHP) (CAS Number 117-81-7 / EC Number 204-211-0) is on the "candidate list" since 28.10.2008. In our products, DEHP is currently detectable in the seals of the drainage systems in concentrations > 0.1%. A change is in progress.

1, 2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME) (CAS Number 110-71-4 / EC Number 203-794-9) is on the "candidate list" since 18.06.2012. EGDME is a constituent of CR2032 lithium button cells and CR P2 lithium block batteries.

N,N-dimethylacetamide (CAS Number 127-19-5 / EC Number 204-826-4) is on the "candidate list" since 19.12.2011. N,N-dimethylacetamide is a constituent of CR P2 lithium block batteries.

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