

## IMO PRECISION CONTROLS LTD REACH STATEMENT

## European Directive EC 1907/2006 Registration, Evaluation, Authorisation and Restriction of Chemicals

As of the 1<sup>st</sup> June 2007 the above European Regulation came into force and in line with IMO Precision Controls recognition for the need for sustainable development and continuous improvement in the reduction of the environmental effect of its activities we are in full support of this legislation and therefore offer the following declaration for your records.

In acheiving compliance with the REACH Directive, IMO Precision Controls confirms that after looking into this Directive our understanding is that any electronic or electrical components that do not intentionally release substances or preparations, listed on the VHC list (including the material addendums from January 2010 upto and including July 2019 – 201 substances and Annex VII upto and including February 2019), under normal operating conditions are not covered under this Directive.

In our opinion, the above covers all IMO products released on to the market for sale and therefore it is IMOs understanding that we do not have to pre-register any of our materials however, as far as we have been able to ascertain IMO products do not currently contain any substance or preparation above the 0.1% w/w of product on the VHC list other than that covered by the following statement.

In line with the European Court of Justice ruling of in 2015 where it was ruled that "the 0.1 % threshold for notifying Substances of Very High Concern in articles applies to "each of the articles incorporated as a component of a complex product" rather than to the entire article" IMO declare that the IMO Human Machine Interface models *i3* may contain a battery that uses >0.1% w/w of the SVHC substance 1,2-dimethoxyethane ethylene glycol dimethyl ether (EGDME) however, IMO's usage of this materials is below the threshold required for REACH registration however, when these parts are used within a system then registration should be assessed on all material usage and not just the component parts thereof. IMO also declare that some models of our terminal block range may contain lead >0.1% when it is used as an alloying element of steel as defined by Exemption 6(a) of Annex III of the RoHS Directive 2011/65/EU and/or copper as defined by Exemption 6(c) of the RoHS Directive 2011/65/EU.

IMO are continually checking with all our suppliers of both raw materials and finished goods to ensure that chemicals on the VHC list are not introduced into our manufacturing processes and as such we continue to support the above declaration.

As conditions of use of IMO products are outside our control, IMO Precision Controls makes no warranties, express of implied, and assumes no liability in connection with any use of the information above

G P Viney