

REACH Position Statement - September 13th 2011

- **Definition of TDK-Lambda Products**

- Under the REACH EU regulation EC 1907/2006 products produced and offered for sale in EU by TDK-Lambda are defined as '**Articles**'

- **Substances**

- No 'substances' are intentionally released from our Products during normal or reasonably foreseeable conditions of use therefore no requirement for TDK-Lambda to 'Register substances' exists.

- **Notification of use of SVHCs** (Substances of very high concern)

- TDK-Lambda already operates an extensive list of 'banned substances' applicable to its products which includes substances controlled under the RoHS Directive and other known substances which are Carcinogenic , Mutagenic , toxic to Reproduction (CMR) , Persistent , Bioaccumulative and Toxic (PBT) , very Persistent and very Bioaccumulative (vPvB) and other substances known to cause serious effects to human health or the environment . Many SVHCs are already on our 'banned list'
- The SVHC 'Candidate List' was first issued on 28th October 2008 by ECHA (European Chemical Agency) and subsequently updated on 13th January 2010 , March 30th 2010 , June 18th 2010 , August 30th 2010 , 15th December 2010 and June 20th 2011 . Frequent additions to the list are expected .
- Most SVHCs are used only in applications completely unrelated to materials and processes used to manufacture our products.
- Our validation process is therefore focused on the small number of SVHCs that carry a 'Low' or 'Possible' risk of being present in our products . So far we have found no evidence of SVHCs in any of our products
- Please refer to our document '**REACH SVHCs possible uses**' for further information
- In the extremely unlikely event of a TDK - Lambda product containing SVHCs above 0.1% by weight and fulfilling the other criteria published in REACH Legislation , TDK-Lambda would comply with the notification procedures required to the authorities .

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- **Information on the composition of articles**
 - In the extremely unlikely event of a TDK - Lambda product containing SVHCs each above 0.1% by weight , TDK-Lambda would comply with the notification procedures to recipients required under REACH Legislation .
- **TDK-Lambda policy**
 - TDK-Lambda will continuously review the ECHA 'Candidate List ' for additions and updates and act accordingly in compliance with REACH regulations .
 - In the extremely unlikely event that a TDK-Lambda product is found to contain SVHCs TDK-Lambda will use its best efforts to update the design and eliminate the SVHC .
- **TDK-Lambda declaration**
 - We have validated a cross section of our products including checks with our in house manufacturing processes and with our supplier base .To the best of our current knowledge no SVHCs on the current 'Candidate list' are used in TDK-Lambda products.

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