

PB Design & Developments Ltd **REACH Compliance Declaration**

The Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (REACH) is European Union Regulation EC 1907/2006 and came into effect on 1st June 2007. The purpose of the Regulation is to protect human health and the environment by restricting and controlling the use of Substances of Very High Concern (SVHC).

We confirm that we understand and recognise the obligations imposed by the REACH Regulation and the legal requirements.

We do not use any SVHCs in our manufacturing processes. We do however, purchase Items manufactured outside of our own facilities.

The list of SVHCs (known as the "Candidate List" is regularly updated by the European Chemicals Agency (ECHA) and monitored for any changes.

The manufacturers of those components are under a legal obligation to declare the presence of any SVHCs present at a concentration above 0.1% (weight/weight) in any products that they supply to us, more specifically with regards to article 33.

Compliance of batteries with REACH article 33

Regulation No 1907/2006 of the European Parliament and of the Council of 18th December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

REACH aims at ensuring that the risks resulting from the use of SVHC are controlled and that the substances be replaced where possible. The identification of a substance as a Substance of Very High Concern (SVHC) and its inclusion in the Candidate List is the first step of the authorisation procedure. Companies may have immediate legal obligations following such inclusion which are linked to the listed substance on its own, in preparations and in articles.

The Candidate List of SVHC which now contains 224 substances can be viewed at:
<https://echa.europa.eu/candidate-list-table>

According to the ruling, the legal obligations also apply to articles (components) that are present in complex products (i.e. products composed of several articles) as long as these articles keep a special shape, surface or design or as long as they do not become waste. With this new interpretation of the regulations our vendors have conducted a thorough investigation into all component parts (i.e. articles) present in the finished article, (battery).

PB Design & Developments Ltd REACH Compliance Declaration

To the best of our knowledge other than articles shown in the table below, no raw material or component contains a substance on the Candidate list of SVHC, or in the restricted list of Annex XVII of REACH above the 0.1% limit.

Substance name	EC number	CAS Number	SVHC property Approx.	Amount of substance in article	REACH Limit
Lead monoxide (Lead oxide)	215-267-0	1317-36-8	Toxic for reproduction (Article 57 c)	<< 0.1% (W/W) < 0.1%	<< 0.1% (W/W) < 0.1%
Lead	231-100-4	7439-92-1	Toxic for reproduction (Article 57 c)	60% (W/W)	<< 0.1% (W/W) < 0.1%
Cadmium	231-152-8	7440-43-9	Carcinogenic (Article 57a) Specific target organ toxicity after repeated exposure (Article 57(f) - human health)	>0.1%(W/W)	<< 0.1% (W/W) < 0.1%
Cadmium hydroxide	244-168-5	21041-95-2	Carcinogenic (Article 57a) Mutagenic (Article 57b) Specific target organ toxicity after repeated exposure (Article 57(f) - human health)	>0.1%(W/W)	<< 0.1% (W/W) < 0.1%

These substances are wholly contained within the battery case and pose no risk to human health and the environment when used correctly according to Manufactures recommendations.

At the end of life, the batteries must be collected and recycled by an authorised route, according to local and national regulations.

Should you have any further questions regarding these matters, please contact PB Design.

Scott Edsall



Managing Director

April 2024