REACH Position Paper

About Lexmark
Lexmark is a world wide developer, manufacturer and supplier of printing solutions and products, including laser printers, inkjet printers and dot matrix printers and associated supplies for the office and home markets. Lexmark products are considered Information Technology Equipment (ITE) for the purposes of various global certifications. These products are sold in nearly 150 countries around the world, and have the required country certifications for their import, sale, and intended use.

Lexmark has long supported global efforts to protect the environment. Lexmark strives to meet the requirements of worldwide sustainability programs, has earned ISO 14001 and OHSAS 18001 certifications at its development and manufacturing facilities worldwide, and supports and fully complies with the European Unions Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) directive and the Waste Electrical and Electronic Equipment (WEEE) directive. Likewise, Lexmark is committed to support and comply with the requirements set forth in the EU Registration, Evaluation and Authorization of Chemicals (REACH) regulation.

▪ Introduction: about REACH

About REACH
REACH, the regulatory system for chemicals in Europe, aims to improve the protection of human health and the environment through enhanced control of the use and production of chemical substances. Lexmark will work closely with its suppliers to ensure product compliance with REACH. Lexmark products fall under the scope of the European Union REACH Regulation 1907/2006. No products or substances provided by Lexmark will be removed from the EU market due to the REACH regulation. For more information about REACH, please visit the following REACH web sites:

echa.europa.eu/home_en.asp
ec.europa.eu/enterprise/reach/index_en.htm
reach.jrc.it/

➢ 1- Pre- Registration

Lexmark continues to work with our chemical suppliers to ensure there will be no impact to production, importation or delivery of any Lexmark manufactured printers or supplies. In some cases the chemical suppliers have decided to act as the Only Representative for their chemicals and will cover all of Lexmark's imports and uses under their pre-registration and registration work. In cases where the chemical supplier will not pre-register their chemicals, Lexmark has an agreement with an EU company to be Lexmark's Only Representative to act on behalf of Lexmark for pre-registration, registration and Substance Information Exchange Forums (SIEF) participation for all chemicals imported into the EU by Lexmark at volumes greater than 1,000 kg per year.

Ink and toner cartridges have been classified as preparations in a container. This means that chemicals contained in the cartridges, that are not already registered or exempt, will need to be pre-registered if they are imported into the EU at volumes greater than 1,000 kg per year.

All chemicals contained in Lexmark manufactured ink, toner and dot matrix cartridges imported into the EU at greater than 1,000 kg per year that are not already registered or exempt have been pre-registered. Pre-registration will allow Lexmark to take advantage of the phased in approach for registration under REACH.

Substance	Registration Date
≥ 1,000,000 kg/year or CMR cat 1 or 2 and ≥ 1,000 kg/year or R50/53 and ≥ 100,000 kg/year	1 December 2010
≥ 100,000 kg/year	1 June 2013
≥ 1,000 kg/year	1 June 2018

➢ 2- Registration

All chemicals contained in Lexmark ink, toner and dot matrix cartridges that have been pre-registered, either by chemical suppliers or Lexmark's Only Representative, will be registered according to the timeline set out in the REACH regulation. All of these chemicals will be registered between June 1, 2013 and June 1, 2018.

➢ 3- Safety Data Sheets (SDS) and Chemical Safety Reports (CSR)

Lexmark is working to provide current SDSs on the Lexmark website for all products imported into the EU. The SDSs will be in the GHS format and compliant with all relevant REACH regulations.

CSRs will be generated during the registration process for chemicals imported into the EU over 10,000 kg per year. Through SIEFs Lexmark will ensure that the uses of Lexmark manufactured cartridges are covered in these reports. Once the CSRs are completed Lexmark will make those reports as required.

The classification, labelling and packaging of substances and mixtures (CLP) should be adopted by the end of 2008. After entry into force, the deadline for substance classification according to the new rules will be 1 December 2010 and for mixtures 1 June 2015. Inks and toners are considered mixtures under this regulation. For more information on GHS and SDS please visit the following website:

ec.europa.eu/enterprise/reach/index_en.htm

▪ Highlight: Substances of Very High Concern (SVHC)

Lexmark declares that none of the fifteen SVHC chemicals from the October 28, 2008 candidate list are contained in our products at concentrations greater than 0.1% by weight of the finished product. This statement applies to all single function, all-in-one, and multi-function inkjet, dotmatrix or laser products and associated consumables. This conclusion is based on multiple internal and external sources of information such as supplier material declarations, common knowledge of typical uses of these substances in Electrical and Electronic Equipment (EEE), the experience of our own materials experts and product design teams, and historical product test data.

The above statement does not include spare and replacement parts (excluding cartridges), repair kits, and other subassemblies. In Lexmark's assessment, we have determined that this is particularly likely for the three substances list in the table below. These substances are widely used as plasticizers in polymers, particularly in flexible PVC which is commonly used as insulation in internal and external cabling and wiring in electronic products. As such, it is reasonable to assume that any part, kit, or subassembly which is a cable, set of cables and/or wires, or consists of mostly insulated wiring and cables contains one or more of the three listed phthalates at a concentration of greater than 0.1% by weight of that part, kit, or subassembly. However, the total import volumes for Lexmark of these three substances would be well under 1,000 kg per year.

Substance Name	**CAS Number**
Dibutyl phthalate (DBP)*	201-557-4
Bis (2-ethyl(hexyl)phthalate) (DEHP)*	204-211-0
Benzyl butyl phthalate (BBP)*	201-622-7

* Safe Use information: As used in the above applications, no additional safe handling guidance is needed for these substances when articles containing them are used as intended and disposed of properly at the end of life.

The list of SVHC chemicals will grow over time and Lexmark will continue to monitor the list and ensure that any impact these chemicals have on Lexmark products is communicated in accordance with the REACH regulation. Lexmark will follow the REACH regulation regarding notification and authorization of any chemicals required under REACH and work with our supplier and the electronics industry to phase out these chemicals. Please dispose of all electronic accessories according to the EU WEEE directory. Please see the instructions regarding WEEE and the disposal and recycling information that were supplied with the electronic device and accessories.