



Quality Document  
**REACH and Plextor**

Quality Assurance Department

# REACH and Plextor



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**Revision History**

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### Table of Contents

<b>1.0</b>	<b>Introduction</b>	<b>4</b>
<b>2.0</b>	<b>What is REACH</b>	<b>4</b>
<b>3.0</b>	<b>REACH and Plextor</b>	<b>4</b>
3.1	Does REACH Affect Plextor?	4
3.2	Do Plextor Import Articles?	4
3.3	Identification of Potential Requirements Related to Articles?	5
3.4	Substances of Very High Concern	7
<b>4.0</b>	<b>Conclusion</b>	<b>7</b>

## **1.0 Introduction**

The following document investigates how the new EU Chemicals Legislation REACH affects Plextor.

## **2.0 What is REACH**

REACH is a new European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the **R**egistration, **E**valuation, **A**uthorisation and Restriction of **C**hemical substances. The new law entered into force on 1 June 2007.

## **3.0 REACH and Plextor**

### **3.1 Does REACH Affect Plextor?**

Three questions need to be asked to determine if REACH has a bearing on Plextor:

1. Do Plextor **manufacture** or **import chemical substances** or **mixtures** of chemical substances (preparations) – **NO**
2. Do Plextor **produce** or **import articles** (for example electronic components) which contain substances included in a list of 'substances of very high concern' (SVHC) or which are released during their use – **Possibly so further investigation is needed**
3. Do Plextor process chemical or formulate preparations for end use (for examples oils) or do they use these formulated products professionally. In this case they would be known as a 'downstream user' – **NO**

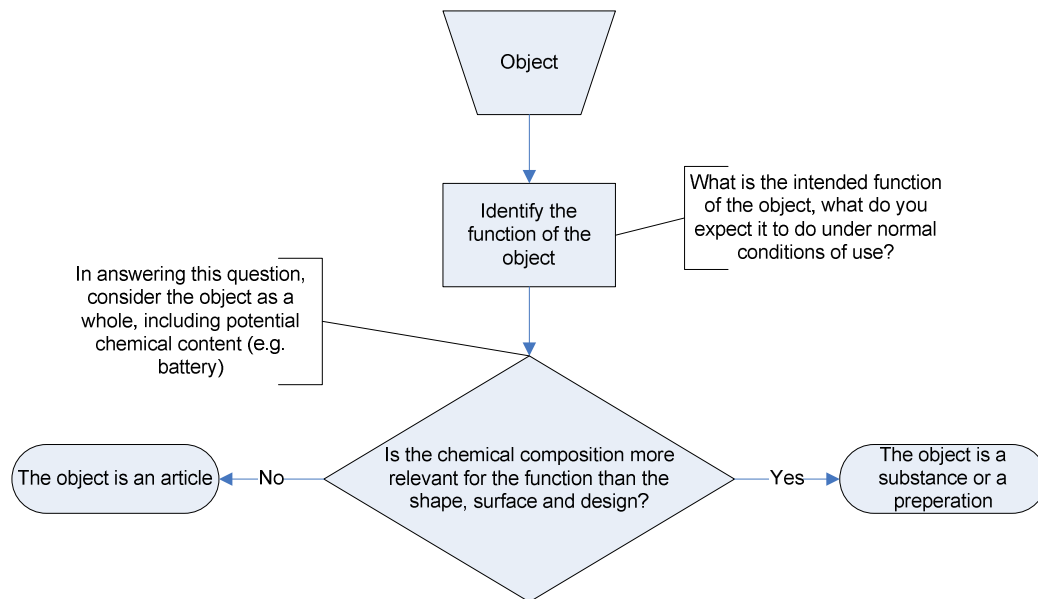
### **3.2 Do Plextor Import Articles?**

From section 3.1 we can see that we need to investigate question 2 – do Plextor produce or import articles.

#### **What is an article under REACH?**

An article is defined under REACH as 'an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition'

So we now have a decision to take on the definition of article



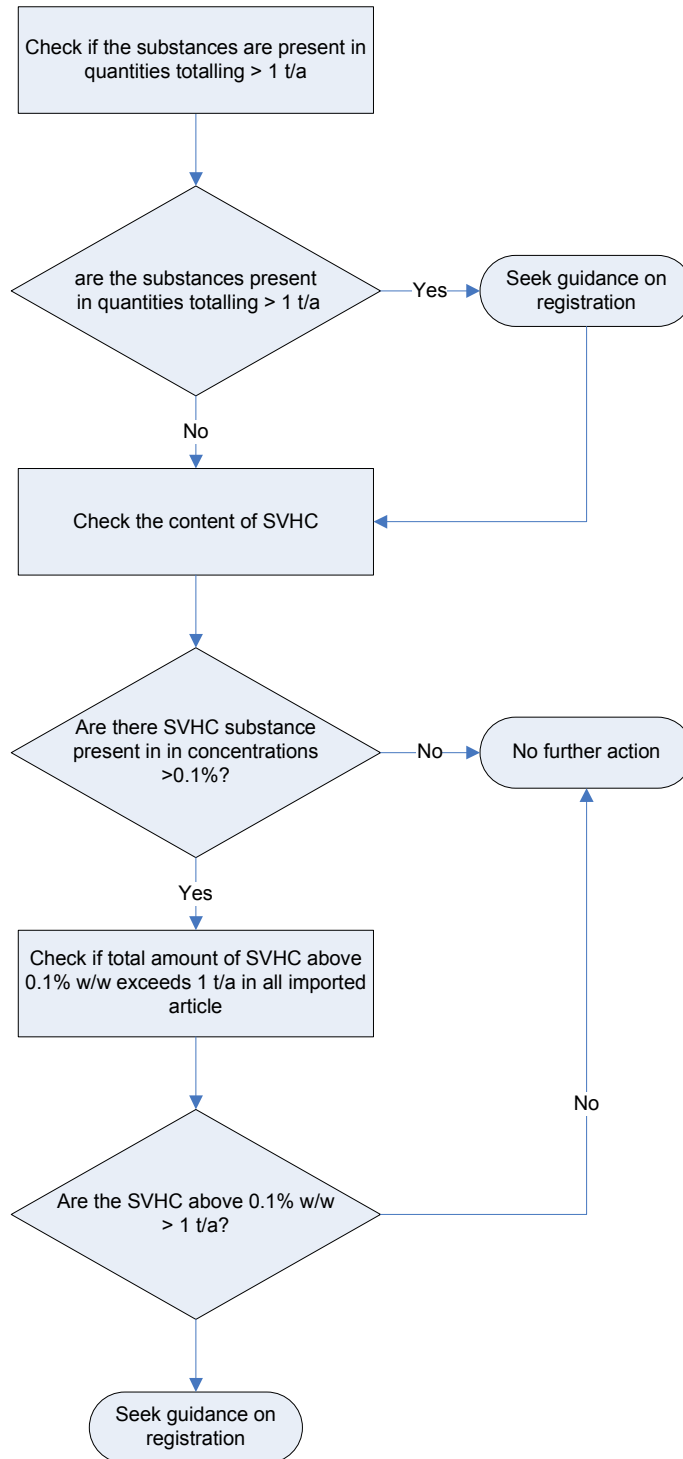
From the flowchart above we can conclude that Plextor do import and supply articles. We now need to identify any potential requirements related to these articles.

### 3.3 Identification of Potential Requirements Related to Articles?

Plextor are an importer and supplier of articles according to the definitions of REACH but do they have any requirements?

Under REACH if you produce, import or supply an article you will be required from June 2011 to 'notify' the ECHA if the article contains an SVHC if both the following conditions are met:

- a) the substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year:
- b) the substance is present in those article above a concentration of 0.1% weight by weight (w/w)



### **3.4 Substances of Very High Concern**

The 15 substances on the candidate SVHC list are as follows

- 4,4'- Diaminodiphenylmethane
- 5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)
- Anthracene
- Benzyl butyl phthalate (BBP)
- Bis (2-ethyl(hexyl)phthalate) (DEHP)
- Cobalt dichloride
- Diarsenic pentaoxide
- Diarsenic trioxide
- Dibutyl phthalate (DBP)
- Hexabromocyclododecane (HBCDD)
- Lead hydrogen arsenate
- Sodium dichromate, dihydrate
- Triethyl arsenate
- Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)
- Bis(tributyltin)oxide

### **4.0 Conclusion**

Under the terms and definitions of REACH Plextor import and supply articles. These articles do not contain any of the 15 substances on the candidate SVHC list in quantities above 1 tonne per annum or in concentrations greater than 0.1% w/w