



European Union REACH Legislation & Champlain Cable Corporation's Position

The European Union chemicals legislation, **REACH** (Registration, Evaluation, Authorization, and Restriction of Chemicals) has many requirements and deadlines, all of which are administered through the European Chemicals Agency (ECHA). This document serves to outline Champlain Cable Corporation's obligations under REACH and how our products comply with directives from ECHA.

Champlain Cable is considered an **article** producer under REACH guidelines. "Article means an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition;" (REACH, Article 3(3)). As an article producer it is our understanding that Champlain Cable or importers of articles [as defined by the REACH legislation EC No 1907/2006, Article 3 (1-3)] made by Champlain Cable **are not** obligated to pre-register or register chemical substances contained in the article unless a substance (total quantity over 1 metric ton/year) is intended to be released from the article during normal or reasonably foreseeable conditions of use [Article 7.1].

Our articles do not intentionally release substances during normal conditions of use. However, based on the information provided to Champlain Cable by its raw material suppliers and our own internal review, some of Champlain Cable's articles may contain some of the now **240** Substances of Very High Concern (SVHCs) listed as of **January 24th, 2024** including:

- 2,4,6-tri-tert-butylphenol - (CAS 732-26-3)
- 2-(2H - benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol - (CAS 3147-75-9)
- 2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-morpholin-4-yl]phenyl]butan-1-one - (CAS 119344-86-4)
- Bumetrizole - (CAS 3896-11-5)
- Oligomerisation and alkylation reaction products of 2-phenylpropene and phenol - (CAS n/a)
- Dibutyl phthalate - (CAS 84-74-2)

As it relates to Annex XVII, some of our products may contain the following substances:

- Octamethylcyclotetrasiloxane (D4) - (CAS No 556-67-2)
- Decamethylcyclopentasiloxane (D5) - (CAS No 541-02-6)
- Cobalt titanate green spinel - (CAS No 68186-85-6)
- Di-"isononyl" phthalate (DINP) - (CAS No 28553-12-0)

However, based on our understanding of the conditions of restrictions, these substances are not restricted for the intended use of our products.

Champlain Cable Corporation is not obligated to pre-register or register any substances or articles under the REACH directive, nor is Champlain Cable Corporation obligated to seek authorization for substances listed in Annex XIV and Annex XVII of REACH.

Please note that the EU *REACH* directive, and specifically the list of SVHCs, is continuously updated. Champlain Cable Corporation is dedicated to meeting the requirements of *REACH*. We look forward to continue supplying our customers with quality products. Please contact Champlain Cable Corporation should you have any questions or comments concerning the *REACH* directive and our products.

Mark Blanco
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April 1st, 2024

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