



REACH SVHC (191) Non-Compliance Declaration

ARLON

August 22, 2018

Arlon Graphics declares that the following products supplied as a sign fabrication materials **do not comply** with the list of 191 Substances of Very High Concern (SVHC) published by the European Chemicals Agency (ECHA) on June 27, 2018:

(<https://echa.europa.eu/candidate-list-table>)

Under the structure of the REACH regulation, Arlon Graphics, LLC is a manufacturer of "articles" to our customers. However, according to [Court Judgment in Case C-106/14](#), the REACH Regulation does not contain any provisions governing specifically the situation of a complex product containing more than one article. [Article 3\(3\)](#) of the REACH Regulation defines an article as "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." In accordance to [Article 33\(1\)](#), any supplier of an article containing a substance on the list in a concentration above 0.1% (w/w) shall provide the recipient with sufficient information to allow safe use of the article including, as a minimum, the name of the substance.

Therefore, Arlon Graphics informs that the articles mentioned **contain** the following REACH substance(s):

No.	PRODUCT SERIES	NON-COMPLIANT SUBSTANCES
1	SERIES 3200	4-Nonylphenol, branched and linear, ethoxylated
2	SERIES 3210	
3	SERIES 3220	
4	SERIES 3270	

On June 28, 2017, ECHA released an update on [Guidance on requirements for substances in articles](#) where calculations of an SVHC must be performed at a semi-homogenous level (per component).

We are being notified by our suppliers if further additions of substances to the SVHC list are present in the products supplied to us. We are also working with our design engineers and suppliers to determine if a viable alternate or substitute is available at the material or part level in order to meet compliance requirements. We understand that our products are in scope and will work diligently to become compliant.

We expect that this letter should answer your concerns with regard to the current status of the products Arlon Graphics supplies to you in relation to EU REACH Regulation (EC) No 1907/2006.

Sincerely yours,

Kelly Kwo
Technical Service Manager
Arlon Graphics, LLC

