

Electronic Film Capacitors, Inc. d/b/a



Your Complete Source for Film Capacitors

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Reach Compliance Declaration

It has been determined that the products we offer are classified as articles by this regulation (European Community Regulation, EC1907/2006). As defined by REACH, an article is a finished product that “during production is given a special shape, surface, or design which determines its function to a greater degree than its chemical composition.” In general, an article is an object composed of one or more substances or preparations given a special shape, surface, or design. Furthermore, *an article is understood to be as produced or imported*. None of our products contain any “substances of intended release”. Typically, our products do not release any substances into the environment. As far as we know, all of the substances that are components and raw materials used in our processes have been registered for our uses by upstream suppliers in our supply chain.

We acknowledge our responsibility as an “actor” in the supply chain to provide information on the composition of articles we supply to you (Article 33), including confirming the absence or presence of any SVHC (Substance of Very High Concern) when they are present in amounts in excess of 0.1% weight by weight. At present, none of the items we supply to you contain any SVHC per the candidate list of December 17, 2015 (168 substances) or Annex 14 in concentrations above .1% weight by weight utilizing the mass balance method. In addition, we have tested the materials used to make our products by a risk based assessment at two internationally certified testing labs to confirm that no SVHC’s are present above the threshold levels. No detectable levels were found. The Technical Construction File required by this Directive is maintained at the corporate headquarters of Electronic Film Capacitors, Inc., 41 Interstate Lane, Waterbury, CT 06705

On December 17, 2015 ECHA added 5 substances to the Candidate List, bring the total to 168 SVHC’s. We have vetted the 7 new substances added in 2015 and collected information from our supply chain to ensure compliance to the latest requirements.

Since our products are very similar in composition across product series we will provide a summary of the parts that we have supplied to you by those product series, upon request. REACH does not require a full content disclosure and preserves the producer’s rights to trade secrets.

It is our intention to continue to comply with the spirit of the REACH directive as well as the letter of the law. To that end, we hired a competent and independent company, Tanzco Management Consulting LLC, to manage our compliance efforts and to ensure that we had taken all prudent actions and completed the due diligence to support all of the claims herein. You may address your requests for information directly to Tanzco Management Consulting at g.tanzman@tanzco.net or to our offices at efc@filmcapacitors.com.