## EU REACH REGULATION INFORMATION SHEET



## RP-Technik GmbH

Hermann-Staudinger-Str. 10-16 63110 Rodgau Germany Tel. +49 6106 660 28-0 Fax +49 6106 660 28-40

Email: info@rp-group.com www.rp-group.com

VAT Reg. No.: DE296414578

REACh stands for Registration, Evaluation, Authorisation of Chemicals.

This new EC regulation centralises and simplifies chemicals legislation across Europe and entered into force on 1 June 2007. The declared objective is to increase the level of knowledge about the dangers and risks that chemicals may pose. The regulation gives companies more responsibility for the safe handling of their products. For further information about REACh, see <a href="https://www.reach-clp-biozid-helpdesk.de/DE/Home/Home-English">www.reach-info.de</a> and <a href="https://www.reach-clp-biozid-helpdesk.de/DE/Home/Home-English">https://www.reach-clp-biozid-helpdesk.de/DE/Home/Home-English</a> node.html.

In accordance with Article 3 (3), (9) and (11) of the REACh Regulation, RP-Technik GmbH, hereinafter RP-Technik, regards itself as an importer and manufacturer of products. Pursuant to Article 7 (1b), substances in products are subject to registration if they are likely to be released under normal and reasonably foreseeable conditions of use. This is not the case for luminaires, lead accumulators, central battery systems, NiMH, LiFePO4 and NiCd accumulators, or electronic components sold by RP-Technik and its subsidiaries. RP-Technik hereby confirms that none of its products are subject to registration in accordance with the REACh Regulation (EC No. 1907/2006).

In some products sold by RP-Technik, adhesives are used or are included as accessories. RP-Technik continuously endeavours however to only use and process materials without chemical additives that fall under the REACh Regulation.

RP-Technik and its employees also ensure that REACh is implemented when purchasing from its suppliers and subcontractors. If, in future, ingredients in its products (in concentrations of greater than 0.1 percent by weight (w/w)) are classified by the European Chemicals Agency (ECHA) <a href="https://www.echa.europa.eu">www.echa.europa.eu</a> as of very high concern, RP-Technik will fulfil its duty to provide information pursuant to Article 33 of the REACh Regulation.

## Extended duty to provide information

For product lines with GEL, GiV, OGiV, OPzS, OPzV and VDS battery types, with the exception of lead (CAS no.: 7439-92-1), on the candidate list, we, as a manufacturer of lead batteries, have an extended duty to provide information within the supply chain.

We hereby inform you that the previously mentioned batteries supplied by us contain lead. The threshold of greater than 0.1 percent by weight (w/w) stipulated in REACh is exceeded in these products. The exact percentage of the lead content varies by battery type.

Lead is classified as a substance toxic to reproduction cat. 1A. This means that lead-containing products pose a direct risk. Since lead has now been included on the candidate list, additional information about the chemical will now be collected and analysed by the ECHA. Lead could therefore be made subject to authorisation under REACh in the future. There are no restrictions as yet however.



The classification under hazardous substances legislation, the regulations on the safe handling of lead-acid batteries, and the range of applications of our products remain unchanged.

The batteries we sell are not regarded as substances, but as products. The preregistration, registration or authorisation required under REACh is therefore not necessary.

In this respect, we would like to point out that compliance with and observance of the relevant operating instructions is strictly compulsory for use of our batteries. We are happy to provide you with relevant leaflets on battery knowledge from the German Electrical and Electronic Manufacturers' Association (ZVEI).

Date of issue: 2019

Roland Pasedag Managing Director/ CEO