

REACH / Substances of Very High Concern (SVHC) / PAH's / Bisphenol A and Phthalates / PBT's / RoH's Statement

Please be informed that our products do not contain Substances of Very High Concern (SVHC), Polycyclic Aromatic Hydrocarbons (PAHs), Bisphenol A (BPA) or Phthalates, and Persistence, Bioaccumulation and Toxicity Chemicals (PBT's) as indicated by ECHA for REACH, above relevant concentration limits (Status Echa Candidate List of 23rd January 2024), see also

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

Although these substances are not intentionally added, this does not exclude the presence of traces due to (among others) impurities in the components supplied by third parties and used in our production facilities. However, based on information from our raw material suppliers we conclude that these traces are less than the Classification & Labelling related threshold values (generally being 1000 ppm).

Regarding the status of CLP (Classification , Labelling and Packaging of chemicals) please be informed that Safety Data Sheets do need to be updated under certain conditions. Those conditions do not apply to MacLellan Rubber (MRL) products. The current versions of the SDSs for MRL products are still valid. Please bear in mind that polymers are exempted from the obligation to register under REACH. For this reason you will also not receive a registration number or eSDS for our polymer products.

Please be informed that Use Description related to REACH is not relevant for MRL products since polymers themselves in general are exempted from the obligation to register with REACH; exposure assessment for making risk characterization and use description is not required.

If you are receiving products from other Companies please contact them for REACH information regarding their products. We would be pleased to help you if you have any further questions.

A full list of substances can be found using the following link

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

PBT - Persistence, Bioaccumulation and Toxic Substances

Annex XIII to the REACH Regulation sets criteria for substances that are persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB).

Under REACH, a PBT/vPvB assessment is required for all substances for which a chemical safety assessment is carried out. A chemical safety assessment is required for substances manufactured or imported in amounts of 10 tonnes or more per year, unless exemptions apply.

Substances that have been assessed are detailed on ECHA's website [PBT assessment list - ECHA \(europa.eu\)](#)

Substances that have been assessed as hazardous to the environment and human health have been added to the REACH list and are covered by our original statement.

RoHS – Restriction of Hazardous Substances

To the best of our knowledge and following active examination of our supply chain all Materials supplied by Maclellan Rubber Ltd comply with Directive 2015/863 (**RoHS 3**). and the current list below:-

- **Lead (Pb):** < 1000 ppm
- **Mercury (Hg):** < 100 ppm
- **Cadmium (Cd):** < 100 ppm
- **Hexavalent Chromium: (Cr VI)** < 1000 ppm
- **Polybrominated Biphenyls (PBB):** < 1000 ppm
- **Polybrominated Diphenyl Ethers (PBDE):** < 1000 ppm
- **Bis(2-Ethylhexyl) phthalate (DEHP):** < 1000 ppm
- **Benzyl butyl phthalate (BBP):** < 1000 ppm
- **Dibutyl phthalate (DBP):** < 1000 ppm
- **Diisobutyl phthalate (DIBP):** < 1000 ppm

This declaration replaces all previous ones relating on this subject.