



珠海巽丰特种塑料有限公司
A member of Wittenburg Group



WITCOM
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WITTENBURG
Your partner in TPE, medical & food compounds

Product Stewardship Bulletin (PSB) for Witcom and Cawiton grades 1. EU REACH and SVHC; 2. UK REACH; 3. RoHS (October 2021)

1. EU REACH and Substances of Very High Concern (SVHC); Annex XIV; Annex XVII

The REACH legislation (EC) 1907/2006, dealing with the Registration, Evaluation and Authorization of Chemicals, entered into force on June 1, 2007 and required manufacturers and/or importers to preregister and/or register chemical substances in accordance with the procedures and timelines prescribed within the Regulation. As a typical Downstream User and a manufacturer of "preparations", Wittenburg Group has closely cooperated with the raw material suppliers to ensure continuity of supply of Wittenburg Group compounded products. Since our Witcom and Cawiton compounds are considered preparations, they are not subject to registration under REACH. Also the main ingredients in our formulations are polymers, which are exempted from registration.

Herewith we can confirm that to the best of our knowledge, our raw material suppliers (manufacturers or importers) have met REACH registration requirements, including the May 31, 2018 deadline for the materials produced or imported in volumes > 1 TPA. At the same time we hereby confirm that Wittenburg Group do not intentionally use any of the following substances:

- Substances of Very High Concern (SVHC) as listed by ECHA in the SVHC candidate list in concentrations above 0.1% by weight in Witcom and Cawiton compounds (containing 219 substances, latest update **July 8, 2021**)
- SVHC Substances included in REACH Annex XIV authorization list (containing 54 substances, as updated per **May 27, 2020**)
- REACH Annex XVII Restricted Substances (as amended).

2. UK REACH (2019 No. 758) The REACH etc. (Amendment etc.) (EU Exit) Regulations 2019

Following the withdrawal of the United Kingdom from the European Union, UK REACH has been implemented. Starting from 1 January 2021, UK REACH and the EU REACH will operate independently from each other. Since the key principles of EU REACH have been retained in the UK REACH, the status of our Witcom and Cawiton compounds will remain the same, more specifically, the exemption rule for polymer registrations still applies, and our Witcom and Cawiton compounds are still considered as "preparations".

Wittenburg Group is closely supporting our raw material suppliers to make sure that there necessary registration obligations are fulfilled, such as Downstream User Import Notification (DUIN) submissions and substance registrations.

3. RoHS Compliance (2011/65/EU, including amendment (EU) 2021/647) and Commission Delegated Directive (EU) 2015/863, amending Annex II of Directive 2011/65/EC

Wittenburg Group do not intentionally add any lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls and/or polybrominated diphenyl ethers during the manufacturing process of our compounds. The statement includes the brominated flame retardants pentabromodiphenyl ether and octabromodiphenyl ether and applies to the following categories of substances:

- Hexavalent chromium compounds < 0.1%
- Cadmium and its compounds < 0.01%
- Mercury and its compounds < 0.1%
- Lead and its compounds < 0.1%
- Polybrominated diphenyl ethers (PBDEs) < 0.1%
- Polybrominated biphenyls (PBBs) < 0.1%
- Pentabromodiphenyl ether < 0.1%
- Octabromodiphenyl ether < 0.1%
- Decabromodiphenyl ether < 0.1%



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- **Bis(2-ethylhexyl) phthalate (DEHP) < 0.1%**
- **Butyl benzyl phthalate (BBP) < 0.1%**
- **Dibutyl phthalate (DBP) < 0.1 %**
- **Diisobutyl phthalate (DIBP) < 0,1 %**

Furthermore, based upon our knowledge of the manufacturing process and information provided by our raw material suppliers, we would not expect these substances to be present in our final product. Analysis for these chemicals is not routinely performed on our final products, however.

Product Stewardship & Regulatory Affairs
Wittenburg B.V., Witcom B.V., Xunfeng Co., Ltd.

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