

Our obligations in relation to REACH

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)¹ places obligations on manufacturers, importers, and downstream users of substances, mixtures, and articles. The obligations depend on the role in the supply chain and the type of product.

In the sense of REACH, M Seals A/S is a supplier of articles (Article 3(33)). We are also an importer (Article 3(11)) and a producer of articles (Article 3(4)).

Article 7

We have no obligation to register substances in our articles as the substances are not intended to be released during use. Likewise, we have no obligation to notify ECHA of substances on the candidate list in our articles as any import would be below one tonne per year.

Articles 33, 57, and 59

We must inform our customers if our products contain more than 0.1 % of any of the substances in the list established in accordance with Article 59(1) (the candidate list).²

We work with our suppliers to gather this information. Some of our products are known to contain more than 0.1 % of substances on the candidate list. A separate list of these products with SCIP numbers are available on our website.

Annex XIV

Annex XIV lists substances for which an authorisation is required for use. We do not use any of these substances in the production of articles. As an importer, we are not subject to authorisation as any potential substances on the list are an integral part of the article.³ We rely on our European suppliers to not use substances which they are not authorised to use.

Annex XVII

Annex XVII contains a list of substances whose use are restricted. Some of our products contain substances on this list. In particular, silicone may contain D4, D5, and D6 (entry 70). However, these substances are not subject to restrictions in silicone polymers. Also, many of our products contain carbon black, which may contain polycyclic aromatic hydrocarbons (PAHs, entry 50) as an impurity.

Our products should not be used in toys and childcare articles, or in products intended for the general public, if the product may come into direct as well as prolonged or short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use. Apart from that, there are no restrictions on the use of our products in relation to Annex XVII.

M Seals A/S
Helsingør, September 2024

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32006R1907>

² <https://echa.europa.eu/candidate-list-table>

³ [Guidance on requirements for substances in articles \(Appendix 1\), Ver. 4.0, June 2017](#)