

## **PennEngineering® REACH STATEMENT**

March – 2021 (interim position)

REACH is a European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the Registration, Evaluation, Authorization and Restriction of Chemical substances. The law entered into force on 1 June 2007. The goal of REACH is to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances.

Currently the European Chemicals Agency identifies 211 SVHC's (Substance of Very High Concern) as potentially harmful. At the present time PennEngineering is still doing due diligence regarding the two SVHCs added in January of 2021 for any parts with a plastic component which includes the following types:

Types PL, PLC and CFN locknuts which contain a nylon locking element

Types PFC2, PFS2, PFK, PFC2P and PFC4 panel fastener assemblies which contain a nylon retaining ring

Type PF11PM with a color code letter suffix and type PSHP panel screw which have over-molded plastic caps.

When due diligence is completed for the above product types this page will be updated. All other catalog parts do not contain any of the current 211 SVHCs in excess of 0.1% of article weight and are compliant to REACH Annex (XIV) and REACH Annex (XVII) except as noted below.

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### **PennEngineering's current product status as it relates to REACH is as follows:**

#### **Standard Cataloged Fastening Products**

Most PennEngineering® standard, cataloged fastening products (manufactured at multiple locations) meet the reach definition of an article as outlined above. Therefore for these products, PennEngineering is in compliance with REACH and is not required to withdraw any product because of registration concerns. In addition we have not been informed by any of our suppliers of any raw material withdrawals concerning these products.

Exceptions which contain in excess of 0.1% of article weight of a SVHC are listed below in generic terms. SVHC content of any combination of type and finish can be checked using the lookup tool at the link below:

[https://www.pemnet.com/design\\_info/rohs-directive/rohs-lookup/](https://www.pemnet.com/design_info/rohs-directive/rohs-lookup/)

– Brass SI® insert types IBB, ISB, ITB, IUB, IUBB, IUTB, MSIB, PFLB, PKB, PPB, & STKB and PEM types KFB3, KSSB, and SMTSOB contain the SVHC lead in leaded brass base metal.

– Atlas® brand SpinTite® product types AETA, AETB, AETC, AETS, AEWA, AEWB, AEWC and AEWS 360° swaging style. The standard finish on these products is cadmium which is an SVHC.

– AETA, AETB, AETC, AETS, AEWA, AEWB, AEWC and AEWS 360° swaging style plated with a “9” plating do not contain a SVHC.

– Atlas® brand MaxTite® fasteners with material designation S (steel) and CH (alloy steel). The standard finish on these products is cadmium which is an SVHC. When exposed to certain corrodents such as hydrochloric acid, cadmium chloride which is also a SVHC will form on the surface of cadmium plated parts.

## Non-standard, Non-Cataloged Products

Certain non-standard PennEngineering products contain cadmium which is an SVHC. These include self-locking versions of NASM part number prefixes M45938/7, M45938/11 and any parts with EF, EF-D, C or CI plating suffix. Also included are steel versions of NASM part number prefixes M45938 or M63540. In addition, steel and alloy steel material versions of Atlas brand SpinTite® Part with a finish code number of 2 or 7 and MaxTite®, Plus+Tite® or Full-Hex body parts with finish suffix CSI or no finish suffix. All the above contain cadmium. When exposed to certain corrodents such as hydrochloric acid, cadmium chloride which is also a SVHC will form on the surface of cadmium plated parts. Locking versions of M459038/7 and M45938/11 and any part with EF, EF-D or TE finish suffix also contain the SVHC lead phosphite.

Other non-standard parts may contain SVHC's other than cadmium. For information on SVHC content of other non-cataloged parts please contact [compliance@pemnet.com](mailto:compliance@pemnet.com).

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Going forward, all substances, that require registration, will be pre-registered by our upstream suppliers or us. Subsequently, all substances that require registration will be registered in accordance with REACH.

A corporate REACH coordinator has been appointed at our Galway, Ireland manufacturing facility. They will oversee all REACH relevant activities, including contacting suppliers regarding their intention to register certain substances (where necessary), communicate safety information to employees and customers, and monitor the SVHC (Candidate List of Substances of Very High Concern for Authorization) list for future additions.

Any questions concerning PennEngineering and REACH requirements should be directed to [compliance@pemnet.com](mailto:compliance@pemnet.com).

Sincerely,  
PennEngineering®

A handwritten signature in black ink, appearing to be 'C. M.', is written over a light gray grid background.

Chief Commercial Officer