



Over the last several years, Precision Associates has received many requests regarding REACH compliance of our rubber products. This document addresses the subject and explains our methods of compliance with the legislation. Precision Associates authors this document purely as an attempt to explain REACH and we do not assume any liability for its contents. For a short overview of this law, please see the reverse of this document, with links to the ECHA website.

REACH is European law. There are no comparable laws in the United States. We are frequently asked if our products, or more commonly if a specific product, is "REACH compliant." Another common and similar question is if our products, or a specific product, contains any amounts of REACH Substances of Very High Concern (SVHC). The later question is becoming more common and is probably more relevant. As of this writing, REACH SVHC are called "Annex XIV" and are substances that are currently acceptable but may be destined to become "Annex XVII". Annex XVII materials are generally prohibited in Europe, with certain permitted exceptions. Experience has shown that the time frame for evolving from Annex XIV to Annex XVII is usually a few years.

PAI manufactures thousands of different products, all of which are at least partially rubber. More commonly, the products are entirely rubber. A small percentage of these products contain small amounts of SVHC. Sale of these items is neither illegal, nor improper in the United States.

ECHA has thus far identified over 70 SVHC. To date, only three of these substances are found in a few PAI products. Two of these, *DEHP* and *DBP* (CAS# 117-81-7 and 84-74-2) are plasticizers, substances added to rubber (or more commonly, to plastics) to soften the material. The original REACH legislation stated that these materials were not to be used in toys and childcare products. As Precision Associates does not make toys or childcare products, we have generally answered that we are "compliant." These plasticizers are widely used in the rubber industry. In virtually every instance PAI will have comparable products that do not contain SVHC, however.

The third SVHC in some of our products is *lead sulfochromate* (CAS# 1344-37-2). This is a component of a yellow colorant used in a few of our compound formulations. It is unclear as to exactly what the magnitude of the European prohibition is regarding this substance, but the point is somewhat moot as lead is prohibited in Europe by a similar European legislation called Restriction of Hazardous Substances (RoHS). RoHS is another European legislation that addresses the use of heavy metals. RoHS was intended mainly to address metals used in electrical products, usually as solders. Like REACH, RoHS grants many specific exemptions. For example, you can use cadmium in paints, but not as a colorant in rubber products.

Our Customer Service operatives are fully trained and equipped to advise our customers when any particular product has any REACH SVHC or is cited by RoHS. In this context, if any SVHC are contained, we refer to it as "non-compliant", despite the disclaimer mentioned above. We address RoHS in similar fashion. If a PAI product contains a RoHS material, it is "non-compliant", though an exemption is a possibility that we have not fully investigated.

Precision Associates actively monitors the REACH website regarding updates on their SVHC list and our operators are equipped to answer any queries regarding compliance.



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The following is taken from the European Chemicals Agency (ECHA) website:

REACH is the European Community Regulation on chemicals and their safe use ([EC 1907/2006](#)). It deals with the **R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemical substances. The law entered into force on June 1st 2007.

The aim 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. At the same time, REACH aims to enhance innovation and competitiveness of the EU chemicals industry. The benefits of the REACH system will come gradually, as more and more substances are phased into REACH.

The REACH Regulation places greater responsibility on industry to manage the risks from chemicals and to provide safety information on the substances. Manufacturers and importers are required to gather information on the properties of their chemical substances, which will allow their safe handling, and to register the information in a central database run by the European Chemicals Agency (ECHA) in Helsinki. The Agency acts as the central point in the REACH system: it manages the databases necessary to operate the system, co-ordinates the in-depth evaluation of suspicious chemicals and is building up a public database in which consumers and professionals can find hazard information.

The Regulation also calls for the progressive substitution of the most dangerous chemicals when suitable alternatives have been identified. For more information read: [REACH in Brief](#).

One of the main reasons for developing and adopting the REACH Regulation was that a large number of substances have been manufactured and placed on the market in Europe for many years, sometimes in very high amounts, and yet there is insufficient information on the hazards that they pose to human health and the environment. There is a need to fill these information gaps to ensure that industry is able to assess hazards and risks of the substances, and to identify and implement the risk management measures to protect humans and the environment.

REACH provisions are being phased-in over 11 years. Companies can find explanations of REACH on the [ECHA website](#), in particular in the [guidance documents](#), and can contact national [helpdesks](#).

Or contact Precision Associates, Inc. laboratory personnel for additional information regarding our compounds.

After 57 years in the rubber business, we've learned to be flexible. We'll bend over backwards to design custom solutions that meet your needs *precisely*. PAI is the company you can trust for rubber seal solutions **YOUR WAY!**

- Over 1,000 different compounds
- More than 2,400 O-Ring Sizes
- In-house Mold Shop
- Custom Molding
- 99% on-time delivery
- ISO 14644-1 Class 7 Clean Room

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