



amethyst

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## FAO Purchasing Department – REACH Compliance

March 2010

Amethyst manages its supply base through its documented quality and environmental management system via approved suppliers. The manufacture of transformers and coils of course requires the use of various solvents and resins but all of these are standard industry products that are not imported or manufactured specifically for us.

### **Reach Regulations - Key Points**

The European law on chemicals, REACH Regulation (EC) No 1907/2006, came into force in June 2008. The legislation requires companies manufacturing or importing substances within the EU above 1 tonne to register the substances and their uses with the European Chemicals Agency.

Under the regulations manufacturers or importers of substances had to pre register non-exempt substances on their own, or in preparations that they produce or import in quantities of over 1 tonne per year no later than 30 November 2009.

Registration requirements also apply to substances intentionally released from articles under certain conditions, in which case the article producer/importer is responsible for the registration.

REACH affects everyone in the supply chain - manufacturers, importers and their customers.

### **Amethyst's Approach to Establishing their Obligations under REACH**

As stated we do not directly manufacture products or import chemicals into the EU therefore our responsibility is only to ensure that the suppliers we use to source our products are aware of their obligation under REACH.

In addition we need to know if any of the products supplied to us contain substances which are required to be registered under REACH Regulations and they are in fact registered accordingly.

To this end Amethyst wrote to all of its suppliers requesting information on their compliance with the REACH Regulations and where appropriate had they registered or were they intending to register the substances.

In addition upon the release of the ECHA Candidate List of Substances of Very High Concern (SVHC) we checked the list against the MSDS documentation for all of the substances on our COSHH substance register and found that none were included in any substance.

### **Amethyst Compliance Status**

Under the regulations, we are considered downstream users. We believe that to the best of our knowledge, all substances within the products we sell have been identified and our suppliers have been contacted to confirm that all substances are registered by our supply base where appropriate.

In view of this we do not believe we have any further direct obligations under REACH Regulations. We do, however, recognise our continuing role in achieving full compliance with the legal requirements of REACH. This we will do via communication of information to relevant suppliers and stakeholders regarding volumes and usages of the substances in the products we supply. We will review this on an annual basis.

If you require any additional information please do not hesitate to contact me.

Paul Wealleans  
Operations Director



Manufacture & Design of Transformers and Wound Components

Registered in England 1602689

