



Registration, Evaluation, Authorisation and Restriction of Chemicals – REACH

As you may well be aware, Sinclair & Rush is currently fully compliant with the REACH regulations. As of the last update, there are some 209 Substances of Very High Concern (SVHC) on the EU Candidate List. We are pleased to confirm to you that we do not have any raw material ingredients in the components you purchase from us, that have been determined as hazardous for listing on the Candidate List in relation to REACH.

From our perspective, being REACH compliant is the priority and we will continue to watch the market with interest to see how raw material suppliers are influenced with the continuing legislation. Our aim is to take the necessary actions to remain REACH compliant both now and into the future.

Whilst writing, we have prepared the following statement that may help you to assure your customers and end users of the suitability of purchasing plastic products manufactured by Sinclair & Rush;

REACH COMPLIANCE STATEMENT

As a “Down Stream User” of Chemicals, we at Sinclair & Rush, has ensured that we are REACH Compliant, by:

1. Appointing our Raw Material Supervisor as our formal REACH Single Point of Contact.
2. Creating an Inventory of every Chemical (Substance) we use in the production of our various Plastic products etc.
3. Confirming the percentages of each Substance used in our Preparations (Mixes) to make our Articles (Finished Goods).
4. Calculating the Annual Tonnage of each Substance, especially for those which totals over one tonne per year.
5. Ensuring that our Suppliers (Raw Material Ingredients) have either Pre-Registered or Registered with the European Chemical Agency.
6. Obtaining from our Suppliers the REACH Registration Numbers for the Substances they supply us.
7. Establishing which Articles (Finished Goods) we produce here in the UK and which Articles we buy in from either the USA or China, and what proportions of each they represent.

8. Retaining Material Safety Data Sheets for each Substance from our Raw Material Suppliers.
9. Providing information to our Customers upon request, any details of Substances that appear on the Candidate List and their proportions used in our Preparations.
10. Researching the market to consider alternative Substances if they appear on the Candidate List of Substances of Very High Concern.

We therefore confirm that we have discharged our regulatory duty to comply with the REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulations 1907/2006 (as amended) as a Down Stream User of Chemicals.



James Gardner
Managing Director
29th June 2020