

March 26, 2024

To Whom It May Concern:

STATEMENT REGARDING REACH REGULATION

As part of our commitment to supply environmentally-safe products throughout the world, PCB supports the aim of the European Regulation EC 1907/2006 on the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH). Article 33 of REACH requires the manufacturer of any article or product to inform their EU market customers if it contains any SVHC (Substance of Very High Concern) with a concentration of greater than 0.1% weight by weight. PCB has closely followed the expansion of REACH since its initial enactment on June 1, 2007. Most recently, on January 23, 2024 the candidate list of EU SVHC has been updated to include 240 substances (the “Candidate List”). We base this declaration of conformity on the wording of the REACH Regulation and the guidelines given in “REACH – Guidance on requirements for substances in articles”, issued by the European Chemicals Agency (ECHA). We base our declaration on the following:

- Products produced and sold by PCB are regarded as Articles, not Substances or Preparations, under REACH.
- Products produced and sold by PCB contain < 0.1% w/w Substances of Very High Concern, except for Metallic Lead which may be present in Solder and some metal alloys over 0.1% w/w in a limited number of models. (However, given the hermetic welded construction of our sensor there is no direct exposure to the SVHC materials, is present, so no Safe Use Instructions are required under the Regulation.)
- Plastic components may contain melamine (EC# 203-615-4), bis(2-ethylhexyl) tetrabromophthalate (TBPH) (EC# 247-426-5), 2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol(UV-329) (EC# 221-573-5), Bumetrizole (UV-326) (EC# 223-445-4), Triphenyl phosphate (TPP) (EC#204-112-2) and Dibutyl phthalate (EC# 201-557-4) above 0.1% w/w in any component (article)
- PCB produces and sells products containing a total < 1 t/a Substances of Very High Concern.
- The Substances or Preparations contained in the Articles manufactured by PCB are not intended to be released during normal and reasonably foreseeable conditions of use.

Based on the foregoing, we believe that PCB is not required by applicable law to take any further actions under the REACH Regulation.

STATEMENT REGARDING REACH REGULATION (CONTINUED)

PCB bases its material content knowledge partly on information provided by third parties, has taken, and continues to take commercially reasonable steps to provide representative and accurate information. However, PCB may not have conducted destructive tests or chemical analysis on incoming material and chemicals.

The information provided in this letter is true and correct to the best of our knowledge based on having taken commercially reasonable review steps. Both PCB and its suppliers consider certain information to be proprietary and therefore, CAS numbers and certain other information is not available for release.

If we subsequently identify a registration requirement for any Substance or Preparation in Articles we have been producing or importing, it is our intent to submit the registration before further production or importation of the Article, if applicable.

As the SVHC List is updated, we will endeavor to promptly inform customers if we know that a product produced by PCB contains more than 0.1% w/w Substances of Very High Concern.

Please let me know if you have any questions or need further information.

Very Truly Yours,

Wendy Willard

Wendy Willard
PCB Regulatory Affairs