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### Holroyd Components Ltd REACH Compliance.

Holroyd Components Ltd continues to recognise the European Regulation No. 1907/2006 concerning Registration, Evaluation, Authorisation & Restriction of Chemicals (REACH), which entered into force June 2007.

Having reviewed the latest ECHA update as of 21<sup>st</sup> January 2025 Holroyd can confirm that, according to current information, **3 substances from the 247** in the candidate list may be present in certain parts we manufacture above the threshold limits.

Octamethylcyclotetrasiloxane (D4), Decamethylcyclopentasiloxane (D5), Dodecamethylcyclohexasiloxane (D6) can be left as an impurity during the production of base silicone. This material is already present within the silicone mixture that we purchase, we do not add any pure D4/D5/D6 into the mixture and do not handle the substances in their pure form.

Exemption for these substances have been allowed when they are a constituent of a silicone polymer on its own and as a constituent of a silicone polymer in a mixture (Applicable exemption (EU) 2024/1328 of May 16, 2024 amending Entry 70 of Annex XVII to Regulation (EC) No 1907/2006. Annex / 5.)

Concentration levels of these substances would need to be calculated on a case-by-case basis due to the range of silicones used. Typical siloxane concentration levels will range between 0.1 – 5%.

### Annex XVII – Restrictions on the Manufacture, Placing on the Market and Use of Certain Dangerous Substances, Mixtures and Articles

Nickel is listed in Annex XVII of the regulations. Nickel is present in resistance wire and foil, thermocouple wire, various fixings, components, connectors and supply leads. It is not however envisaged that they are used in a manner that would result in prolonged contact with skin. Labels on products containing Nickel do not include hazard or warning symbols, under Article 23, and users will need to determine whether their particular use contravenes the restrictions laid out in the regulations. The entry is reproduced below.

#### Entry 27 – Nickel

CAS No 7440-02-0 / EC No 231-111-4 and its compounds

Conditions of restriction

1. Shall not be used:

(a) in any post assemblies which are inserted into pierced ears and other pierced parts of the human body unless the rate of nickel release from such post assemblies is less than 0,2 µg/cm<sup>2</sup>/week (migration limit);

(b) in articles intended to come into direct and prolonged contact with the skin such as:

- earrings,
- necklaces, bracelets and chains, anklets, finger rings,
- wrist-watch cases, watch straps and tighteners,
- rivet buttons, tighteners, rivets, zippers and metal marks, when these are used in garments, if the rate of nickel release from the parts of these articles coming into direct and prolonged contact with the skin is greater than 0,5 µg/cm<sup>2</sup>/week.

(c) in articles referred to in point (b) where these have a non-nickel coating unless such coating is sufficient to ensure that the rate of nickel release from those parts of such articles coming into direct and prolonged contact with the skin will not exceed 0,5 µg/cm<sup>2</sup>/week for a period of at least two years of normal use of the article.

2. Articles which are the subject of paragraph 1 shall not be placed on the market unless they conform to the requirements set out in that paragraph.

3. The standards adopted by the European Committee for Standardisation (CEN) shall be used as the test methods for demonstrating the conformity of articles to paragraphs 1 and 2.

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Signed: 

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