

# Regulation Compliance Statement - REACH & RoHS

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Area.: AbsorGel®, Absorpole® & other desiccants manufactured and distributed by Absortech Group

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## REACH (EC) 1907/2006

REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals.

To comply with the requirements in REACH (EC) 1907/2006 Absortech has REACH-registered Calcium chloride (CaCl<sub>2</sub>) .

Absortech reg. no at ECHA (European Chemicals Agency) is: [01-2119494219-28-0096](#).

Absortech Group also declares that, to the best of our knowledge, all products that are manufactured and supplied by Absortech Group do not contain any Substances of Very High Concern (SVHC), identified in the REACH Candidate list or Annex XIV, in a concentration equal to or above 0,1% weight by weight (w/w). There are neither any restrictions in the REACH Annex XVII that are applicable to the above-mentioned products.

## RoHS 2011/65/EU

This directive restricts (with exceptions) the use of several hazardous materials in the manufacture of various types of electronic and electrical equipment.

Any packaging material (which includes desiccants) that will be discarded after a product's purchase is not considered to be part of the electronic equipment, so it does not fall within the scope of the RoHS directive.

Absortech Group also declares that, to the best of our knowledge, all products that are manufactured and supplied by Absortech Group do not contain any of the proscribed substances specified in [RoHS 2011/65/EU](#).

## European Food Contact Regulation and FDA- U.S. Food & Drug

### Administration

The component of a food contact article, that is reasonably expected to become a component of food is potentially a food additive, subject to the premarket approval requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act). Specifically, substances that are reasonably expected to migrate to food because of their intended use are defined as food additives (FD&C Act Section 201(s)) if they are not prior sanctioned or generally recognized as safe (GRAS) for their use. All food additives are required to undergo FDA premarket approval in accordance with Section 409 of the FD&C Act.

Absortech Desiccants (AbsorRange™) does not represent a food additive situation and therefore are not subject to the food additive regulations (does not require FDA clearance). Though the outer material (raw material, plastic) is in conformity to Regulation (EC) No 1935/2004, (EC) No 2023/2006, Commission Regulation (EU) No 10/2011 and is therefore approved to be used in contact with food.

Absortech Desiccants (AbsorRange™) is approved for use in transportation of food products if installed and used correctly and in accordance with the purpose of the product. Direct contact with food should be avoided.

In the case of leakage due to accidents or incorrect use, the part of the food product that has been contaminated shall be considered as waste.

## FAQs:

There are numerous misinterpretations of REACH, RoHS, DMF, etc.

Below, please find questions and answers for practical guidance.

**Q1: How to know that a desiccant is REACH compliant?**

A: A supplier or manufacturer of desiccants who puts product on the market in EU must fulfil the REACH regulation which includes a list of Substances of Very High Concern to be REACH-compliant. There is no official certificate or official logo that indicates that a desiccant is REACH compliant, but for a desiccant that includes Calcium Chloride (CaCl<sub>2</sub>) there shall be a registration within the Calcium Chloride dossier at ECHA. Absortech reg.no is 01-2119494219-28-0096.

**Q2: Can we have a copy of Absortech's REACH certificate?**

A: There is no 'REACH-certificate' issued by any authority. Though, Absortech's registration number in the Calcium Chloride dossier can be checked at ECHA webpage. This registration confirms that Absortech is allowed to bring Calcium Chloride to EU market.

**Q3: What is the correct REACH logotype?**

A: There is no consensus logotype. A REACH logotype on a box or product does not by itself mean the product is REACH compliant.

**Q4: What about 'DMF-free'?**

A: DMF is one (of the more than 200 substances in the Substances of Very High Concern (SVHC), identified in the REACH Candidate list or Annex XIV) and must be under the stipulated SVHC concentrations. Being REACH compliant means being DMF-free.

**Q5: Are your products SGS (certified, tested, approved, etc)?**

A: SGS is often referred to in the desiccant industry but is neither a 'certificate' nor an approval. SGS is a 'inspection, verification, testing and certification company' with accreditation to verify and validate compliance to a standard, norm or similar. There are many laboratories having the same accreditations. (Absortech has used SGS but could have used another laboratory with the same accreditation).

**Q6: Our company import from outside the EU and use desiccants to protect the cargo from moisture damages. How do REACH impact us?**

A: REACH only regulates desiccants put on market in the EU (intended to be used or re-sold). If used for protection of a container bound for the EU it is not falling under the REACH regulation.

**Q7: Is RoHS relevant in respect to desiccants?**

A: No. As pointed out in the Compliance Statement, it is applicable for 'electronic and electrical equipment'. And has nothing to do with desiccants.