

## ASSESSMENT REPORT PROPOSAL IN COMPLIANCE WITH REACH

We have been commissioned by the client to conduct REACH compliance assessment on their products (Contract No.: RT-SVHC-010-1100178). We have assessed the client's product under the European Regulation (EC) No 1907/2006 (hereinafter referred as REACH Regulation), including product categories, substances list, SVHC (Substances of Very High Concern) as well as the client's responsibilities and obligations for this product under REACH Regulation. The result and findings of the assessment and our proposals are described as follows:

### 1. Client's Information

Name: Star Seals Co., Ltd.  
Address: Shandong Road No. 46, Shinan District, Qingdao, P. R. China  
Name of the contact person: Ziyin Liu  
Tel: +86-532-80970086  
Fax: +86-532-80970085

### 2. Product Identification

Product name: Rubber sheet  
Type/ model: 20cmx20cm  
Physical appearance/colour: Solid/black  
Product type: Article

### 3. Product Substances Information

#### 3.1 Substance on its own or in mixtures

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

#### 3.2 Substance in article intended to be released

Index	Substance name	CAS No.	EC No.	Tone
N/A	N/A	N/A	N/A	N/A

#### 3.3 SVHC (Substance of Very High Concern) in article (Details see Annex 1)

### 4. Responsibilities and Obligations

#### 4.1 Registration

4.1.1 According to the definition in Article 3(3), Chapter 2, Title 1, the client's product, Rubber sheet is regarded as "Article" under REACH Regulation.

4.1.2 According to Article 7(1), Chapter 2, Title 2 of REACH Regulation, there is no substance intended to be released under normal or reasonably foreseeable conditions of use in the client's product. Therefore,

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registration is not required.

4.2 Notification  
As the concentrations of the SVHCs defined in Article 57 of REACH Regulation in the client's products are less than 0.1% weight by weight (w/w), the obligation of notification is not required according to Article 7(2) under REACH Regulation.

Note: Dissenting views, questioning the application of the 0.1% threshold to the entire article have been notified by 6 Member States (Austria, Belgium, Denmark, France, Germany and Sweden) and this calculation method was not endorsed by these Member States.

In this report, we adopt the opinions from these Member States that the 0.1% threshold should relate to individual articles, parts or materials that a complex article consists of.

#### 4.3 Information Communication down the Supply Chain

As the concentrations of the SVHCs in the client's product are less than 0.1% weight by weight (w/w), the obligation of communicating information down the supply chain is not required in accordance with Article 33 of REACH Regulation.

#### 4.4 Others

##### 4.4.1 Authorisation

Since the manufacture of this product is based outside the EU, and the lifecycle of related substances outside EU is irrelevant with respect to REACH Regulation, there is no obligation of authorisation required for the client's product.

##### 4.4.2 Restriction

The directive on marketing and use of dangerous substances 76/769/EEC have been repealed since 1 June 2009, and the client should follow the restriction conditions outlined in Annex XVII in REACH Regulation from then on.

As we haven't received any testing request of Restricted Substance from our client, the detail of restricted substance in the product is unknown.

### 5. Assessment Conclusions

According to the product information provided by the client and related Articles of REACH Regulation, we draw the conclusion that:  
**The products supplied by the client comply with REACH Regulation about SVHC as it currently stands.**

### 6. Proposal for REACH Compliance

6.1 The client should inform his downstream users as soon as possible that the products mentioned above comply with REACH.

6.2 The client should pay constant attention to the SVHCs in the candidate list and fulfil related obligations if necessary. This list may be updated regularly and it is important to monitor any changes to it.

6.3 The client should pay special attention to the restricted substance in the annex XVII.

6.4 The client should ensure the exported products are consistent with the sample provided to Chemical Inspection & Regulation Service Limited in material, vendors and production process.

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