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January 7, 2025

SUBJECT: REACH Compliance Declaration

Dear Valued Customers,

The European Regulation 1907/2006 on Registration, Evaluation, Authorization, and restriction of Chemicals (REACH) entered into force on June 1, 2007. The goal of REACH is to ensure the protection of human health and the environment from the risks that can be posed by chemicals.

This legislation will have significant impact on all manufacturers, importers and downstream users in the EU and requires registrations of chemical substances, preparations, and articles with an intended release of substances. Suppliers operating outside the EU are asked to support this initiative by providing certain data regarding the hazards of the substances to ensure compliance.

REGISTRATION

Royal Containers does not manufacture chemicals, preparations or articles that intentionally release substances under normal operating conditions and therefore do not fit within the scope of entities obligated to pre-register and register with REACH. Both our company and key suppliers are committed to fulfill our legal obligations under REACH and seek to uphold our role in the necessary communication network needed to support REACH compliance.

Restriction of Chemicals – Annex XVII

Annex XVII of the REACH regulations imposes restrictions on hazardous substances in preparations or articles that present risks to human health or environment. The restriction covers a wide range of applications. We certify that our products comply with the conditions of the restriction as defined in Annex XVII Titled “Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles” dated June 26, 2009.

Substance of Very High Concern (SVHC) – Annex XIV

As of **January 17, 2023** ECAH (The European Chemicals Agency) has placed **223** substances in the Candidate List of Substances of Very High Concern for authorization. Any SVHC must not be used, manufactured, or imported without the prior authorization of the ECAH. The “candidate list” will be updated and published periodically by ECHA as more substances are identified as SVHC.

Royal Containers declares that certain products we manufacture may contain an article made of certain copper and aluminum alloys that contain the substance **Lead** (Pb; CAS: 7439-92-1; EC:231-100-4), which is included in the list of SVCH substances as of June 27, 2018, in concentrations even higher than 0.1% w/w.

All other Royal Containers are not intentionally manufactured or formulated with compounds and substances above the 0.1% threshold by weight listed in the REACH document titled “Candidate List of Substances of Very High Concern for Authorization” dated **January 17, 2023**.

The determination is based on information from sources which we believe are reliable. Product users are responsible for determining the applicability of REACH and other related environmental regulations based on their individual usage of the final product.

Should you have further questions, please do not hesitate to contact us. For and on

behalf of Royal Containers,

Kim Nelson

Kim Nelson
President