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|  | <b>Document Title</b>   | <b>Document ID</b> |
|   | <b>RoHS, REACH, EPA &amp; CALIFORNIA PROPOSITION 65<br/>COMPLIANCE DECLARATIONS</b> | <b>QAF-1318</b>    |
| <b>Procedure Reference</b>  |   | <b>Revision</b>    |
| Customer Support Process  |   | <b>13</b>          |

Performance Coatings International Laboratories, LLC, dba “PCI Labs”  
600 S Murray St, Bangor, PA 18013, USA

PCI Labs provides high-quality UV-curable products (chemical preparations and homogenous coated material articles,) that meet international environmental regulations, including EU Directive (EU) 2015/863 (RoHS-3), the European Union’s Regulation (EC) 1907/2006 (REACH) and lists of EPA TSCA Section 6(h) & California’s Proposition 65 Declaration (USA.)

## ROHS COMPLIANCE

PCI Labs is producing RoHS compliant coated articles. All chemical preparations and homogeneous material articles are compliant and marked as RoHS compliant. RoHS Compliant means that the substances restricted by EU Directive 2015/863/EC and subsequent amendments of the European Parliament, are not contained in a finished product above threshold limits, unless the restrictive substance is subject to an exemption provided in the RoHS-3 Directive.

Compliance of PCI Labs’ products and services with RoHS and REACH regulations is affected through:


- Controlling the materials used in our products.
- Periodic audits of our suppliers to ensure compliance.
- Supplier compliance statements.

## ROHS-3 (ROHS-JULY 22, 2021)

Directive 2011/65/EU of the European Parliament, June 8, 2011, on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) became effective on January 3, 2013. Some of the provisions of Directive 2011/65/EU were phased out, and new provisions were amended in EU Directive 2015/863 (RoHS-3.) PCI Labs meets all requirements of RoHS-3, Chemical Abstract Service (CAS) chemicals, dated as of July 22, 2021, including category 11 restricted substances.

## REACH COMPLIANCE (2022 UPDATED)

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) was first released. This Regulation establishes specific duties and obligations for companies in the European Union (EU) that manufacture or import substances on their own, in preparations for these articles.

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Under the REACH EC Regulation 1907/2006, Title II, Chapter 1, Article 7.1(a) & (b), PCI Labs is a contract manufacturer and supplier of homogeneous material coated “articles” to our customers. We do not manufacture, or supply “substances” and coated articles do not cause the “intentional release of substances”. Accordingly, we foresee no registration or pre-registration requirement for the products and services we provide, according to Articles 59(10), 7, 31 and 33.

PCI Labs is constantly monitoring the substances of very-high concern (SVHC) as defined by REACH, in our products. This will be an ongoing process since the complete list of SVHCs will be released in stages. Customers are encouraged to visit the following site to get the most up-to-date information on the current list of SVHCs under REACH. [echa.europa.eu/candidate-list-table](http://echa.europa.eu/candidate-list-table)

Based on communication with our raw material suppliers, we conclude that to the best of our knowledge our products requiring REACH compliance do not contain any of the currently listed SVHC in concentrations greater than 0.1% w/w. We will communicate with customers should this position change. Revisions to SVHC candidate list which have been reviewed in preparation of this statement as of June 10, 2022 (224 SVHCs.)

## **EPA TOXIC SUBSTANCES CONTROL ACT COMPLIANCE (January 16, 2021)**

PCI Labs certifies that all UV-curable coatings sold do not contain any of the five Persistent, Bio-accumulative, and Toxic (PBT) chemicals under EPA’s 15 U.S.C §2601, TSCA, Section 6(h), regarding use and risk management of the following PBT chemicals: DecaBDE, PIP 3:1, 2-4-6-TTBP, HCBd and PCTP. In addition, PCI Labs is in full compliance with the upcoming in 2022/2023 ten (10) more TSCA prioritized risk-management chemicals (Asbestos, PV29, HBCD, NMP, TCE etc.) as they are not used in any of our chemical products and/or facility.


## **CALIFORNIA PROPOSITION 65 DECLARATION**

PCI Labs products do not contain chemicals which are listed in the California Safe Drinking Water & Toxic Enforcement Act of 1986.

The act commonly known as Proposition 65 (Prop 65,) establishes a list of chemicals which the State of California risk assessment process has determined to present a risk of cancer, birth defects or other reproductive harm. The Proposition 65 chemical list can be found at:

<https://oehha.ca.gov/proposition-65>

Be assured, that PCI Labs will continue to monitor OEHHA Proposition 65 regulations for updates, full compliance, and disclosure. Updated December 2021, Proposition 65 List.

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|  <b>PERFORMANCE<br/>COATINGS<br/>INTERNATIONAL<br/>LABORATORIES</b> | <b>Document Title</b>   | <b>Document ID</b> |
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PCI Labs meets RoHS3, REACH, EPA and California’s Proposition 65 directives and manages information flow as required by these Regulations. PCI Labs’ chemical preparations and homogeneous material coated articles - mostly customer supplied parts, - do not exceed minimum threshold limits established by the European Chemical Agency (ECHA), nor are sold in quantities greater than 1 ton/year and thus, no further reporting is necessary.

Should you require more details on this process, please contact PCI Labs’ Quality Assurance at 610-588-7900 or email us at [quality@pcoatingsintl.com](mailto:quality@pcoatingsintl.com).

Signature: 

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President

Date: 07/1/2022

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