



## JOINTINE PRODUCTS (LINCOLN) LTD and REACH (EC1907/2006)

*This statement applies to our entire range of glue/glycerine products (Firefly®, Flexoid®, Sizoid®, Oakenstrong®, Klinger Statite AS80.090, and all other brands)*

After careful consideration, and with approval from the Health and Safety Executive (HSE) here in the UK, we conclude that there is no obligation upon us to register our product under the REACH directive (Registration, Evaluation, Authorisation and Restriction of Chemical substances) EC1907/2006.

Our glue/glycerine based gasket materials are deemed to be an 'article' as defined by the REACH directive, and as a down-stream user of our article I am required to inform you of the reasons why we believe our products are exempt from registration.

### OUR REASONS

- 1. The products used in our manufacturing process are, for the most part, intrinsically refined natural materials. We believe them to be outside the remit of the REACH directive which defines substances as elements and their chemical compounds.*
- 2. We have received similar statements of exemption from the Suppliers of our natural raw materials.*
- 3. There are currently 209 substances contained in the list of Substances of Very High Concern (SVHC), and the list was last updated 25/06/2020. The few chemicals which are used in our manufacturing process leave behind only a small residual trace (which is not intended for release), of which the concentration is below the 0.1% (w/w) limit specified by REACH, and are therefore not required to be registered.*
- 4. We have many years experience of manufacturing and supplying soft paper gaskets, and to the best of our knowledge none of the products we handle or import represent a high degree of risk or potential hazard to human or animal life.*

If you need any further information, please do not hesitate to contact me.

**Mrs Jane Smith**  
Managing Director

Reviewed June 2020