

Customer Information regarding Regulation (EC) 1907/2006 (REACH)

Dear customer,

REACH¹ is the European Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals which entered into force on 1 June 2007.

What are the objectives of REACH?

The overall aim of REACH is to ensure a high level of protection of human health and the environment against risks from chemicals. Ultimately, the most hazardous substances shall be substituted with less dangerous ones, both in chemicals and in finished products.

Authorities, e.g. the European Chemicals Agency (ECHA), can ban hazardous substances within the EU, restrict their use or make them subject to prior authorization.

Does REACH affect lamps and luminaires?

Generally, REACH distinguishes between “substance“, “mixture“ and “article“. Manufacturers and importers, respectively, must assess and determine which definition is applicable for their individual products.

Lamps, luminaires and (electronic) components are “articles“.

However, some provisions in REACH apply specifically to articles, for instance certain information duties and restrictions of the use of certain chemicals or mixtures in articles.

Provisions for Articles

The following fundamental provisions of REACH are applicable for articles:

- Art. 7: “Registration and notification of substances in articles”
- Art. 33: “Duty to communicate information on substances in articles“
- Art. 67: “Restrictions on the use of certain dangerous substances in articles“

Art. 7: “Registration and notification of substances in articles”

This provision is applicable to the “first supplier” of an article, i.e. the manufacturer or importer who places the article on the EU market, but not to other recipients in the downstream supply chain within the EU. The provisions of art. 7 therefore only concern LEDVANCE as the entity placing the products on the market.

When placing its products on the market, LEDVANCE ensures that the provisions of art. 7 are fulfilled. There are no obligations for you as the purchaser of LEDVANCE products!

¹ Link to EU REACH Website: https://ec.europa.eu/growth/sectors/chemicals/reach_en; REACH regulation: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006R1907R\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006R1907R(01))

Art. 67: “Restrictions on the use of certain dangerous substances in articles“

Art. 67 and annex XVII define restrictions and bans with regard to the use of certain substances in articles. Again, this provision applies only to the “first supplier“ who places the article on the EU market. There are no obligations for recipients in the downstream supply chain in the EU.

When placing its products on the market, LEDVANCE ensures that the provisions of art. 67 and annex XVII are fulfilled. There are no obligations for you as the purchaser of LEDVANCE products!

Occasionally, articles are described as “REACH-compliant“. This refers to the obligations under art. 7 and 67. By supplying its products, LEDVANCE confirms that they are in compliance with the requirements of REACH.

Art. 33: “Duty to communicate information on substances in articles“

REACH requires suppliers to provide information to their customers if an article contains a Substance of Very High Concern (SVHC) listed on the Candidate List² in a concentration exceeding 0.1 % weight/weight. This duty applies as soon as a substance has been included in the Candidate List.

Currently, ECHA updates the Candidate List semi-annually by adding new substances. These can be used further provided they do not fall under the restrictions of art. 67.

Complex objects like lamps and luminaires are assembled from different components. The concentration limit of 0.1 % (w/w) triggering the information duty refers to each individual component, provided it was considered an article under REACH before assembling the complex object.

If a component of an article contains a SVHC in a concentration exceeding 0.1 % (w/w), then the customer must be informed with regards to the article as a whole.

What information must be provided?

Art. 33 simply states that suppliers “shall provide ... sufficient information ... to allow safe use of the article including, as a minimum, the name of that substance“.

As a minimum requirement, the name of the substance must therefore be provided. In addition, the supplier must assess if a recipient needs further information to allow safe use of the product. The result of such assessment will depend on the intended use of the product, the SVHC in question as well as the component containing the SVHC. Therefore - and to create customer confidence - it makes sense to provide also information about the component containing the SVHC³.

² Link to candidate list on ECHA website: <http://echa.europa.eu/web/guest/candidate-list-table>

³ German Federal Institute for Occupational Safety and Health (BAUA), “REACH Info 6: Articles Requirements for Producers, Importers and Distributors“, https://www.baua.de/EN/Service/Publications/Guidance/REACH-Info-06e.pdf?__blob=publicationFile&v=6

According to the recommendations of BAUA, information pursuant to art. 33 should be provided in the following format:
“This product contains [SVHC].“ or “[Component xyz] contains [SVHC].“

Which SVHC may be present in LEDVANCE products?

With the inclusion of metallic lead in the Candidate List of 27 June 2018, the information duties under art. 33 became suddenly applicable to a large number of electronic products, especially to those relying on one of the lead exemptions in Annex III of the EU RoHS Directive⁴: Lead in steel, aluminum or copper alloys, high temperature solders, etc. In addition, lead and lead oxides are used in electronic components, and silicone components tend to contain residues of certain siloxanes.

LEDVANCE provides its customers with accurate information about its products which contain at least one SVHC in a concentration exceeding 0.1 % (w/w).

SVHC in lamps and luminaires – is there any hazard for users?

LEDVANCE supplies articles which will not release any substance under normal conditions of use. Accordingly, proper use of the product will prevent any SVHC-related risk, in particular an exposure of the user or the environment. For this reason, LEDVANCE products do not require additional SVHC-related instructions for use, particularly since lamps, luminaires and (electronic) components are not intended to release substances during use.

When used properly, LEDVANCE products will not pose any SVHC-related risk to users or the environment.

Our promise to you!

LEDVANCE pursues an environmental policy for sustainability. We strive to provide our customers with SVHC-free products. However, technical limitations and the need to ensure the product's functionality over its entire lifetime make it often impossible to avoid components containing an SVHC in a concentration exceeding 0.1% (w/w). LEDVANCE is continuously working together with its suppliers to substitute SVHC in its products.

You will find further information under www.ledvance.com/reach.

⁴ Link to RoHS Directive 2011/65/EU: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1565173413556&uri=CELEX%3A32011L0065>