



**PowerVolt Group**  
**(Including Ensign Corp., Wabash Transformer and PowerVolt)**  
**REACH Compliance Statement**

**April 12, 2018**

**To:** All PowerVolt, Ensign and Wabash Transformer Customers.

**Regarding:** REACH Compliance to 181 SVHC

This letter is to confirm that PowerVolt Group (including PowerVolt, Ensign and Wabash Transformer) complies with EU directives 1907/2006/EC amended by (EU) 2018/35. We confirm that the 181 compounds are NOT found in our manufacturing centers and products that we produce and sell.

**What REACH is:**

REACH is a European Union (EU) directive concerning the **R**egistration, **E**valuation, **A**uthorization and **R**estriction of **C**hemicals. It is a system for controlling chemicals in Europe. The United Kingdom adopted REACH as law on June 2007 (**latest SVHC update 01/16/2018**).

**Goals of REACH:**

- To provide a high level of protection of human health and the environment from the use of chemicals.
- To make the people who place chemicals on the market (manufacturers and importers) responsible for understanding and managing the risks associated with their use.
- To allow the free movement of substances on the EU market.
- To enhance innovation in and the competitiveness of the EU chemicals industry.
- To promote the use of alternative methods for the assessment of the hazardous properties of substances.

**Definition of Manufacturer:**

A manufacturer is an organization based in the EU and European Economic Area (EEA) that produces or extracts a substance. This could be by chemical synthesis (i.e., by reacting chemicals together), by smelting (e.g., production of metals from ores), or by extracting them from another source (e.g., from crude oil or plant material). Companies that simply blend substances together (formulators) are not classified as manufacturers by the REACH directive, and therefore do not fall within the scope of its requirements.

**Conclusion:**

Since PowerVolt Group does not presently import REACH's 1 ton annual minimum of chemical substances into the EU and further, does not fit the definition of a manufacturer, as provided by Health and Safety Executive ([www.hse.gov.uk](http://www.hse.gov.uk)), REACH does not currently apply to our product offering.

PowerVolt Group will continue to monitor the REACH directive and its applicability to our products. At any point that we do fall within REACH's scope, we will provide any required reporting, and/or execute any appropriate modifications, to comply with the REACH directives.

Although the formal REACH reporting requirements do not apply to PowerVolt Group at this time, we are nevertheless committed to being environmentally responsible. PowerVolt Group products do not contain any of the Substances of Very High Concern (SVHC) above 0.1% (1,000 ppm).

**Sources:**

- <http://www.hse.gov.uk/reach/whatisreach.htm>
- <http://www.hse.gov.uk/reach/resources/manufacturers.pdf>
- List of SVHC Substances:
  - <http://echa.europa.eu/web/guest/candidate-list-table>
  - <https://echa.europa.eu/candidate-list-table>
  - <https://echa.europa.eu/-/seven-new-substances-added-to-the-candidate-list-entry-for-bisphenol-a-updated-to-reflect-its-endocrine-disrupting-properties-for-the-environment>