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## Statement of REACH: Registrations, Evaluation, Authorization and restriction of Chemicals, for Rogers' Arlon Silicone Products

REACH is a European Union Regulation for the Registration, Evaluation, Authorization and restriction of Chemicals as of June 1st, 2007. REACH places greater responsibility on industry to manage the risk of substances and chemicals to human health and the environment.

As of June 27<sup>th</sup>, 2018, Rogers has taken several steps to ensure that our customers importing Rogers' silicone products under Arlon brand into the European Union meet current REACH requirements. In an effort to communicate the details of REACH to all of our customers the following areas of concern are communicated below. Please review all of the areas of concern to better answer any REACH questions you may have and to better understand your requirements and responsibilities as an importer of Arlon products to the European Union. If you still have questions or concerns please contact your Sales Engineer or Rogers Customer Service at <http://www.rogerscorp.com/ems/arlon/index.aspx/contact.htm>

### 1) Substances of Very High Concern (SVHC)

- a) Rogers does not intentionally use any of the 191 substances identified by the European Chemicals Agency (ECHA) and listed in the June 27<sup>th</sup>, 2018 revision of the SVHC list as raw materials in its Arlon brand silicone rubber based products except when the use is critical to the performance of the product and no other substitute yields acceptable product performance or when the substances are contained as impurities in raw materials<sup>1</sup>.

- i) Calendered Products: The following products contain an SVHC.

- (1) 15370T020 ≤ 0.14% w/w of boric acid
- (2) 16370T020 ≤ 0.14% w/w of boric acid
- (3) 48113R010U-38P ≤ 0.16% w/w of boric acid

- (a) Importers should contact Rogers for information on ECHA notification

- ii) Uncured Calendered Products: The following products contain SVHCs

- (1) (GG)0(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6
- (2) (GG)1(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6
- (3) (GG)4(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6
- (4) (GG)5(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6
- (5) (GG)6(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6
- (6) (GG)7(Co)(TTT): 0.1-1.0 % w/w of D4, 0.1-1.0 % w/w D5, 0.1-1.0 % D6

Calendered part number form: (GG)(##)(C)(Co)(TTT)  
[example: 51276R015]

- (a) (GG) Two digit code identifying the substrate [51 = Style 7628 fiberglass]
- (b) (##) Two digit code identifying the silicone rubber compound [27 = 427CR compound]
- (c) (C) One digit identifying the product construction [6 = cured side 1 and uncured side 2]
- (d) (Co) One or two letters identifying the product color [R = red]
- (e) (TTT) Three digit code identifying the overall product thickness [015 = 0.015"]

iii) Self Fusing Tape Products: The following tapes contain an SVHC.

- (1) LW###-##(Co)-## 0.1-3.0 % w/w of boric acid
- (2) 9##-##(Co)##-## 0.1-3.0 % w/w of boric acid
- (3) A#####-(Co)###-## 0.1-3.0 % w/w of boric acid
- (4) T#####-(Co)###-## 0.1-3.0 % w/w of boric acid
- (5) MT###-##(Co)##-## 0.1-3.0 % w/w of boric acid
- (6) RBLW###(Co)#-## 0.1-3.0 % w/w of boric acid
- (7) HSLW###(Co)#-## 0.1-3.0 % w/w of boric acid

- (a) ECHA notification is mandatory for importers if both of the following conditions are met:
  - (i) The Candidate List substance is present in those articles above a concentration of 0.1% (weight by weight).
  - (ii) The Candidate List substance is present in the articles they import at a total of >1 Metric ton per importer per year.
- (b) ECHA communication is mandatory for importers if the following conditions are met:
  - (i) The Candidate List substance is present in articles above a concentration of 0.1% (weight by weight).
  - (ii) The candidate substance was not registered for the use in the article.

The communication of the SVHC Candidate List substance is presented in the respective Rogers Globally Harmonized Safety Data Sheet.

**2) Arlon products that are exempt from REACH registration because they are considered Articles:**

- a) Arlon MOX-Tape® Fiberglass Reinforced Silicone Self Fusing Tape
- b) Arlon MOX-Tape® Unsupported Silicone Self Fusing Tape
- c) Arlon Reinforced Silicone Self Fusing Tape
- d) Arlon Rectangular Silicone Self Fusing Tape
- e) Arlon LevelWrap® Silicone Self Fusing Tape
- f) Arlon Rapid Bond LevelWrap® Tape
- g) Arlon High Strength LevelWrap® Tape
- h) Fully cured, calendered products (unsupported or laminated)
- i) Uncured and cured, calendered silicone products with a supporting fabric

**3) Products that may require REACH registration depending on the annual import quantity per customer have the following (GG) prefix to the calendered part number: 99 and 32.**

**4) Additionally, bulk compound may require REACH registration depending on the annual import quantity per customer and are designated by the following part number form: CP-###(CO)**

- (1) Bulk compound part number form: CP-(###)(CO)
  - (a) [example: CP-427R]
    - (i) (CP) Bulk compound designation
    - (ii) (###) Three digit compound code identifying the silicone rubber compound [427]
    - (iii) (CO) One or two letter(s) identifying the product color [R = red]

**5) Products that are exempt from REACH registration are those with import quantities of less than one metric ton annually per importing customer.**

**6) Rogers has pre-registered through our Only Representatives (OR) with regards to the European Union’s Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Regulation (EC) No 1907/2006, substances in the following compounds.**

3222(C)(CO)(TTT) CP-322		3260(C)(CO)(TTT) CP-434
3260(C)(CO)(TTT) CP-434		32(PC-2959)(C)(CO)(TTT) CP-PC-2959
3227(C)(CO)(TTT) CP-427(CO)		3214 (C)(CO)(TTT) CP-414(CO)
3210(C)(CO)(TTT) CP-510(CO)		3257(C)(CO)(TTT) CP-410(CO)

If you have any further questions or need additional information please contact Rogers at <http://www.arlon-std.com/contact.htm>

1. The claim is based solely on Materials Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) information provided by our suppliers of raw materials. Rogers Corporation makes no representation that it has verified the accuracy of the MSDS/SDS information upon which this declaration is based. Rogers Corporation accepts no responsibility for incomplete or inaccurate information contained in this declaration. Rogers Corporation accepts no duty to notify users about changes to the provided information. Rogers Corporation is not liable for any damages, direct or indirect, consequential or otherwise, that the Reader or any third party might incur as a result of any incompleteness or inaccuracy of the information contained in this declaration form, or as a result of ignoring this warning.