



REACH position statement

4th April 2017

TDK-Lambda Corporation
TDK-Lambda EMEA

- **Definition of TDK-Lambda Products**

- Under the REACH EU regulation EC 1907/2006 products produced and offered for sale in EU by TDK-Lambda are defined as '**Articles**'

- **Substances**

- No 'substances' are intentionally released from our Products during normal or reasonably foreseeable conditions of use therefore there is no requirement for TDK-Lambda to 'Register substances' .

- **Notification of use of SVHCs (Substances of very high concern)**

- TDK-Lambda already operates an extensive list of 'banned substances' applicable to its products which includes substances controlled under the RoHS Directive and other known substances which are Carcinogenic , Mutagenic , toxic to Reproduction (CMR) , Persistent , Bioaccumulative and Toxic (PBT) , very Persistent and very Bioaccumulative (vPvB) and other substances known to cause serious effects to human health or the environment . Many SVHCs are already on our 'banned list'
- The SVHC 'Candidate List' was first issued on 28th October 2008 by ECHA (European Chemical Agency) and repeatedly updated since then . Currently 173 SVHCs are listed . Frequent further additions to the list are expected . It is expected that at least 400 substances will eventually be listed .
- Most SVHCs are used only in applications completely unrelated to materials and processes used to manufacture our products.
- Please refer to our document '**REACH SVHCs possible uses**' for further information
- Our validation process is focused on obtaining Full Material Declaration (FMD) of parts from TDK-Lambda suppliers . Within the Electronics Industry more and more suppliers are providing FMD data but some consider FMD information to be proprietary. For those suppliers unable to do so presently , we obtain compliance certificates or conduct laboratory testing when appropriate . So far we have found no evidence of SVHCs above 0.1% by weight in any of our products
- In the extremely unlikely event of a TDK - Lambda product containing SVHCs above 0.1% by weight and fulfilling the other criteria published in REACH Legislation , TDK-Lambda would comply with the notification procedures required to the authorities .
- TDK-Lambda are aware of the preliminary ruling by the European Court of Justice in the Case C-106/14 whereby the 0.1% by weight level would apply to each individual ARTICLE contained within a TDK-Lambda product . Accordingly we are reviewing the status of our end products and will continue to comply with the relevant legislation.

4th April 2017

- **Information on the composition of articles**

- In the extremely unlikely event of a TDK - Lambda product containing SVHCs each above 0.1% by weight , TDK-Lambda would comply with the notification procedures to recipients required under REACH Legislation .

- **TDK-Lambda policy**

- TDK-Lambda will continuously review the ECHA ‘Candidate List ‘ for additions and updates and act accordingly in compliance with REACH regulations .
- In the extremely unlikely event that a TDK-Lambda product is found to contain SVHCs above 0.1% by weight ,TDK-Lambda will use its best efforts to update the design and eliminate the SVHC .

- **TDK-Lambda declaration**

- We have validated a wide range of our products with a combination of methods including ;
 - Validation of BOMs through Greensoft Technology Inc (www.greensofttech.com) , a leading provider of environmental compliance services .Currently TDK-Lambda have 54744 parts under Greensoft data management
 - At present 40221 parts (73.5%) have Full Material Declaration (FMD) from the supplier.
 - Direct checks with our supplier base
 - Compliance checks with our in house manufacturing processes .
- To the best of our current knowledge and due diligence no SVHCs on the current ‘Candidate list’ are present above 0.1% by weight in TDK-Lambda products .
- Declarations for specific TDK-Lambda products are available upon request . Please contact your local TDK-Lambda sales office

4th April 2017

