

**Subject:** REACH Compliance

Dear Customer,

This letter concerns Regulation (EC) No 1907/2006 on the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) compliance of MG Chemicals (MG) products.

**SVHC-209 Statement (Candidate List for Inclusion in Annex XIV)**

As of the latest June 25, 2020 update, the only MG products known to contain Substances of Very High Concern (SVHC's) candidates above reporting thresholds are listed in Table 1. For non-MG distribution products, please contact us or the manufacturer for product-specific REACH compliance information.

**Table 1.** Presence of Substance of Very High Concern Candidate in products that may still be available in the EEU

<i>MG Part Number</i>	<i>Product Name</i>	<i>Substance</i>
832HD Part B	1:1 Epoxy Potting and Encapsulating Compound	41% 4-nonylphenol, branched CAS# 84852-15-3
832TC Part A and Part B	Thermal Conductive Epoxy	0.1% 1-methyl-2-pyrrolidinone CAS# 872-50-4 ( <i>removed in May 2019</i> ) <sup>a)</sup>
1035-85ML, 1035-85MLCA	Premium RTV Silicone Adhesive Sealant	<1% octamethylcyclotetrasiloxane CAS# 556-67-2 <1% decamethylcyclopentasiloxane CAS# 541-02-6 <1% dodecamethylcyclohexasiloxane CAS# 540-97-6
4140A-P	Flux Remover Pen	24.8% decamethylcyclopentasiloxane CAS# 541-02-6 0.3% octamethylcyclotetrasiloxane CAS# 556-67-2
4860-4867	Sn63Pb37 No Clean Solder Wire	36.2% lead CAS# 7439-92-1 ( <i>deleted in 2019</i> )
4860P	Sn63Pb37 No Clean Solder Paste	33% lead CAS# 7439-92-1
4870-4877	Sn60Pb40 No Clean Solder Wire	38.8% lead CAS# 7439-92-1 ( <i>deleted in 2019</i> )
4880-4888	Sn63Pb37 RA Solder Wire	36.2% lead CAS# 7439-92-1 ( <i>deleted in 2019</i> )
4890-4898	Sn60Pb40 RA Solder Wire	39.5% lead CAS# 7439-92-1 ( <i>deleted in 2019</i> )

*Note:* This table excludes products that are not intended to be placed on the market in Europe. The 841WB, 842WB, and 843WB were reformulated to remove the 1-methyl-2-pyrrolidinone (NMP) in 24 September 2018; therefore, (Bath number 18 279) and above do not contain NMP.

*Table continued on the next page*

**Table 1. (continued)** Presence of Substance of Very High Concern Candidate in products currently available in the EEU

<b>MG Part Number</b>	<b>Product Name</b>	<b>Substance</b>
8329TCM Part B	Medium Cure Thermally Conductive Adhesive	10% 4-nonylphenol, branched CAS# 84852-15-3 ( <i>reformulating</i> ) <sup>b)</sup>
8329TFM Part B	Medium Cure Thermally Conductive Adhesive, flowable	12% 4-nonylphenol, branched CAS# 84852-15-3 ( <i>reformulating</i> ) <sup>b)</sup>
8330 Part B	Medium Cure Silver Conductive Adhesive	18% 4-nonylphenol, branched CAS# 84852-15-3 0.4% 4,4'-isopropylidenediphenol CAS# 80-05-7 ( <i>reformulating</i> ) <sup>b)</sup>
8331 Part B	Silver Conductive Adhesive, Moderate Cure / High Conductivity	22% 4-nonylphenol, branched CAS# 84852-15-3 0.8% 4,4'-isopropylidenediphenol CAS# 80-05-7 ( <i>reformulating</i> ) <sup>b)</sup>

**NOTE:** The candidate list can be checked online at

[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp#download](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp#download)

- a) The 832TC Part A and Part B were reformulated to remove the 1-methyl-2-pyrrolidinone (NMP). The 832TC products with production date past 10 May 2019 (Batch number 19 130A and 19 130B) and above do not contain NMP.
- b) These products are being reformulated to remove SVHCs.

### REACH Annex XIV Authorization List

As of the latest list published, none of our current products being placed on the market contain substances currently listed in Annex XIV Authorization.

Note: The 4-nonylphenol, branched with CAS# 84852-15-3 contained in some of four of our products isn't ethoxylated, so the authorization related to "4-Nonylphenol, branched and linear, ethoxylated" doesn't apply.

### REACH Annex XVII Restriction List

As of the latest list published, the products in Table 3 may trigger substance-specific restrictions for some uses. Please refer to the appropriate clause in the regulation for full details.

**Table 3.** Products with substance-specific Annex XVII restriction

<b>Product Name</b>	<b>Clause</b>	<b>Restriction Summary</b>
841/841AR Super Shield Nickel Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body.
841ER Super Shield—ER Nickel Epoxy Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body.
841WB Super Shield Nickel Conductive Coating	27. Nickel	Not for use in articles inserted or in direct or prolonged contact with human body.
419C Acrylic Conformal Coating	48. Toluene	Industrial Use Only
422B Silicone Modified Conformal Coating	48. Toluene	Industrial Use Only
4226 Super Corona Dope	48. Toluene	Industrial Use Only

The listed products with toluene at greater than 0.1% shall not be placed on the market as a spray paint for supply to the general public. These are an INDUSTRIAL USE ONLY products.

Product with nickel are not to be used for body piercing or for articles in direct or prolonged contact with skin due to possible sensitization.

### **REACH Registration**

MG UK currently did register isopropyl alcohol (IPA) in the >1 t to 10 t band. Other than the IPA, it does not import one ton of any individual substance to the European market and is, therefore, neither required nor eligible to register any other substances under REACH at this time. European customers of MG can continue to use our products as long as their total usage of any particular substance contained in these products remains under the one-ton threshold.

If you are a user or potential user of an MG product in Europe and you feel your future consumption of a substance may exceed the one ton threshold, please contact us as soon as possible so that we have adequate time to register our substances to meet your needs.

It is important to note that polymers are exempt from REACH registration, so if MG's epoxies are used in a manufacturing process outside of Europe and then the cured product is shipped into Europe, the cured product is exempt from REACH registration requirements (although the restrictions on SVHC's remains).

MG is a reporting downstream user for many substances. For example, many of our epoxy resins and hardeners also contain components that are pre-registered by our suppliers, allowing downstream reporting. Other products will be dealt with on an "as need" basis.

*European customers should take note that the ultimate responsibility for registration may fall on them where MG hasn't yet met the one ton threshold. Customers must calculate the total quantities of individual substances used from different suppliers to determine if their usage exceeds the one ton threshold, triggering registration requirements.*



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