



Palram REACH Declaration - Brief No. 19

Update: March 11th, 2019

Dear Customer,

In order to ensure proper implementation of the REACH regulation, we have established a dedicated team of professionals to examine the obligations of our products and substances according to the REACH rules. Our team is managing a detailed inventory of all substances used in Palram products, including the yearly amount of each substance exported to our EU customers, in order to enable a profound understanding of the activities that must be accomplished. Under REACH regulation, our products are defined "Articles" and as such are subject to requirements related to "substances in Articles" as defined in Articles 7 & 33 of the regulation, namely Registration, Notification and the duty to communicate Information throughout our supply chains. Details of our obligations, activities and commitments within REACH are as follows:

Registration: The comprehensive examination conducted by our REACH team on polymer articles manufactured by Palram proved that no intended substance release from the polymeric matrix of Palram's products occurred under normal and foreseeable conditions of use. Therefore, to the best of our knowledge, substances contained in our products are exempt from registration obligation (Art. 7.1).

Notification: The obligation of notification is effective since June 1st 2011. No substance from the current Candidate List for Authorization (SVHC updated by ECHA on January 15th, 2019) found in Palram's products ([LINK](#) to last updated Candidate List, [LINK](#) to candidate list substances in articles) therefore there is no need for additional measures to be taken concerning notification activity. Nevertheless, Palram continuously examines the Candidate List for Authorization, which is updated regularly, and so is its applicability to our products.

Information: Based on supplier information, Palram products do not contain substances currently defined by ECHA as Substances of Very High Concern (SVHC) above the applicable threshold (0.1%). Since we do not analyze these components, this statement is based on information received from our raw material suppliers. Palram, as a downstream user, works closely with its suppliers. Please note all efforts are made on a regular basis to obtain the most updated and precise information regarding the presence of SVHC in the products supplied to Palram by its suppliers. If it is detected, as a result of the next Candidate List updates, that some of our products' constituents are included in the SVHC list, we will provide all our customers with data regarding substances contained in our products to allow safe usage (Article 33). The statement above is valid and accurate as of the date of this letter and to the best of our knowledge for Palram products in original sale condition.

Palram will continue to keep up-to-date with the evolving REACH regulation and make sure it fully satisfies all requirements.

Palram Industries Ltd
Ramat Yohanan, Israel
Technology Department