



**Accu**  
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# Hazardous Substances Compliance Statement

Revision 31 (12th May 2023)

## Scope

The following statement is applicable to all standard stainless steel, steel, nylon, polyamide, and acetal fastener products listed online by Accu Limited (except those designated as “discontinued” or “available offline”), and also includes stainless steel fasteners incorporating complementary materials contained in our standard product ranges: bright zinc plated steel, plastic patch, nylon inserts, etc. (except those designated as “discontinued”).

The scope of this document does **not** include:

- Components used in applications for which they are not designed, such as where fasteners could come into direct and prolonged contact with skin such as in:
  - earrings,
  - necklaces, bracelets and chains, anklets, finger rings,
  - wrist-watch cases, watch straps and tighteners,
  - rivet buttons, tighteners, rivets, zippers and metal marks, when these are used in garments.
- Components intended to be used by, or with the potential to be ingested by, children.
- Custom manufactured components manufactured to a customer-provided specification.

ACCU LIMITED. REGISTERED IN ENGLAND, COMPANY NO: 08016434. VAT NO: GB136780105.

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This section is optional, see scope above

**This statement also applies to the following components:**

**Accu Part Code (APC)**

- Applies to RoHS and REACH compliance
- Applies to RoHS compliance only
- Applies to REACH compliance only

With exemption:

Without exemption

**Print Name**

I confirm that I have received written confirmation, from the original manufacturer, that this Accu Part Code is compliant with the requirements of this statement, outlined below.

**Signed**



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## RoHS Compliance

RoHS (Restriction of Hazardous Substances), is an EU directive on the restriction of certain hazardous substances within electrical and electronic equipment.

While Accu Limited's components are not directly covered by the scope of RoHS regulations, we understand that RoHS is an important consideration for many of our customers. To that end, Accu Limited can confirm that components listed within the scope of this statement do not contain over the designated threshold of the banned substances below:

Restricted Substance	Maximum Designated Threshold
Cadmium	100 ppm (0.01% weight)
Hexavalent Chromium †	1000 ppm (0.1% weight)
Lead ‡	1000 ppm (0.1% weight)
Mercury	1000 ppm (0.1% weight)
Polybrominated biphenyls (PBB)	1000 ppm (0.1% weight)
Polybrominated diphenyl ethers (PBDE)	1000 ppm (0.1% weight)
Bis(2-Ethylhexyl) phthalate (DEHP)	1000 ppm (0.1% weight)
Benzyl butyl phthalate (BBP)	1000 ppm (0.1% weight)
Dibutyl phthalate (DBP)	1000 ppm (0.1% weight)
Diisobutyl phthalate (DIBP)	1000 ppm (0.1% weight)

† Products finished Zinc and subsequently coated with a yellow passivate; the yellow passivate contains a small quantity of Hexavalent Chromium <0.01%, concentration dependent on product type and size; alternative coating should be considered.

‡ Lead as an alloying element in steel and copper alloys (including brass) for machining purposes.

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## REACH Compliance

Accu Limited can confirm compliance with REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) Regulation, including the criteria for identifying SVHCs (Substances of Very High Concern) and Restricted Substances present in our components.

## REACH Restricted Substances

Accu Limited confirms that the components listed within the scope of this document, excluding those used in applications specifically excluded by the scope above, do not contain any of the Restricted Substances in the conditions listed under UK REACH or EU REACH Annex XVII.

## REACH Restricted Substances

### EU REACH SVHCs - 233

REACH is a European Union Commission (EUC) Regulation on the distribution and safe use of chemicals (EC 1907/2006) which entered circulation on 01 June, 2007.

EU REACH registration and notification of substances requirements apply to substances manufactured or imported into the EU in quantities of 1 tonne or more per year at a concentration greater than 0.1% W/W. Generally, it applies to all individual chemical substances on their own, in preparations or in articles.

As Accu Limited does not import goods into the EU above this threshold, it is not required to submit a registration to the European Chemicals Agency (ECHA) for any article we import from outside the EU.

As all components listed within the scope of this document either do not fall under the scope of restrictions, or do not contain SVHC substances in excess of 0.1% of weight, Accu Limited is not required to register or obtain authorization for these components for the following reasons:

1, The items are considered an article under REACH and any finish is integral to the function of the item.

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2, The items or finishes are not intended to be released into the air, ground or water in the EU.

The eventual oxidation of the items or any finish constitutes normal wear and tear of the item or its finish performing their intended function. According to REACH, normal wear and tear does not constitute "release".

## **UK REACH SVHCs - 209**

Under the European Union (Withdrawal) Act 2018, the EU REACH Regulation was brought into UK law on 1 January 2021 and is known as UK REACH.

UK REACH registration and notification of substances requirements apply to substances manufactured or imported into the UK in quantities of 1 tonne or more per year at a concentration greater than 0.1% W/W. Generally, it applies to all individual chemical substances on their own, in preparations or in articles.

As Accu Limited does not import goods into the UK above this threshold, it is not required to submit a registration to the Health and Safety Executive (HSE) for any article we import from outside the UK.

As all components listed within the scope of this document either do not fall under the scope of restrictions, or do not contain SVHC substances in excess of 0.1% of weight, Accu Limited is not required to register or obtain authorization for these components for the following reasons:

1, The items are considered an article under REACH and any finish is integral to the function of the item.

2, The items or finishes are not intended to be released into the air, ground or water in the UK.

The eventual oxidation of the items or any finish constitutes normal wear and tear of the item or its finish performing their intended function. According to REACH, normal wear and tear does not constitute "release".



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## Ozone Depleting Substances Compliance

Accu Limited certifies that Ozone Depleting Substances are not contained in any of the products or packaging materials outlined in the scope of this document.

## Proposition 65 Compliance

Accu Limited has identified that stainless steel and other materials included under the scope of this statement can expose you to chemicals including nickel and chromium.

Nickel alloys are specifically excluded as a carcinogen under OEHHA's designation. As a result, stainless steel and other nickel alloys are not subject to Proposition 65 warning requirements.

Other components under the scope of this statement, such as copper alloys, may contain alloying elements such as lead, which are known to the state of California's Prop 65 to cause cancer, birth defects, and/or reproductive harm.

For more information, visit: <https://www.p65warnings.ca.gov/>

## Additional Compliance Information on Accu Products

Accu's compliance with the above regulations in relation to the products outlined in the scope is ensured through:

- o Regular analysis and adaptation to the evolution of RoHS, REACH, and any future regulations.
- o Strict control of the materials and finishes used in all present and future product ranges.
- o Periodic analysis of our suppliers and manufacturing partners to ensure coordinated compliance.
- o Periodic analysis of our products on an as-needed basis.

We will maintain the requirement for our upstream suppliers and manufacturers to advise of any change in circumstance concerning prohibited substances.



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We hope this statement satisfies your requirements. If you require any further information, please do not hesitate to contact us at [compliance@accu.co.uk](mailto:compliance@accu.co.uk)

Best regards,

Daniel Ackroyd - Head of Compliance

Accu Limited