

May 28, 2021

Dear Valued Customer:

Thank you for your interest in our company's products. The information provided below is intended to help you to understand some of the requirements of the European Union (EU) Law entitled REACH and to communicate our position with respect to REACH Compliance.

**BACKGROUND:** "REACH is a European law regarding chemicals and their safe use. It deals with the Registration, Evaluation, Authorization and Restriction of Chemicals." In order to be impacted by this law you must manufacture or import 1 ton or more on any chemical substance per year. If your company falls into this category, you must pre-register.

**POSITION:** Searing's products do not contain any chemicals that appear on the "Candidate List of Substances of Very High Concern" (most recently updated on 5-Jan-2021) and furthermore are considered "articles". Articles are not subject to authorization. A brief summary of the supporting information is supplied below.

REACH defines an Article as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition;" (REACH, Article 3(3)).

A registration (Article 7.1) of substances in articles is obligatory for an article producer or importer only if the following conditions are met:

- The substances are intended to be released from the produced or imported article(s) during normal and reasonably foreseeable conditions of use.
- The total amount of the substance present in the articles with intended releases produced and/ or imported by that actor exceeds 1 ton per year per producer or importer.

Searing maintains, for the tubing that it supplies, substances are not intended to be released during normal and reasonably foreseeable conditions of use. Appendix 3 of the ECHA Guidance for the implementation of REACH ([http://reach.jrc.it1docs/guidance\\_document/articles\\_en.htm](http://reach.jrc.it1docs/guidance_document/articles_en.htm)) supports this position.

We will review our position as required, based upon additional clarification or modifications to the law. If you have any further questions, please feel free to call me at (909) 948-3030.

Best Regards,



Richard Searing  
*Executive Vice President of Operations*