



## Molex and REACH

The **Registration, Evaluation and Authorization of Chemicals Regulation**, otherwise known as REACH, came into force 1 June 2007. REACH is not specifically a product substance restriction requirement like RoHS, but rather a regulation that is designed to ensure substances have been properly evaluated, registered and the method of safe-use effectively communicated to the end-user. This Regulation consolidated European Union (EU) chemical laws into a unified piece of legislation with the intent of improving the control over chemicals that adversely affect human health and the environment. Government oversight is present through the establishment of a European Chemicals Agency (ECHA).

The REACH Regulation applies to all substances (“chemical elements and their compounds in the natural state”) that are manufactured or imported into the EU. These substances may be in their natural state or as part of an “article”. An article is an “object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition”. Examples of articles include cell phones, computers, and electronic components, such as connectors.

The requirements for compliance with the REACH Regulation differ depending on whether a company is an importer of an article or maintains operations in the EU. As a company that does both, Molex must consider each situation in order to comply.

### Products

For products that are imported to the EU, there are primarily three criteria that dictate whether registration, notification to the ECHA, or SVHC communication to customers is required. The first criterion is that the substance in question must be intentionally “released” under normal conditions of use. An example of the intentional release would be a fragrance from a scented eraser. In addition, the substance being released must be present in those articles in quantities totaling over 1 metric ton per year per producer/importer. **To the best of our knowledge, we do not produce any articles that fall under this criterion and therefore do not expect to have to register any Molex products with ECHA.**

The second criterion includes notification to the ECHA of substances. Under Article 7.2, any article producer or importer whose products meet certain conditions must notify the ECHA. The timeline for notification to the ECHA does not start until 1 June 2011. Molex does not anticipate meeting the conditions for notification at this time but we will continue to assess our products for applicability to this requirement.

The third criterion concerns a list of “substances of very high concern” or SVHC. In October 2008, ECHA published a list of SVHC which includes 15 substances. **The presence of an SVHC in an article has no impact on the ability to sell a product into the EU, it only regulates the need to communicate SVHC in the product to the customer or consumer.** According to Article 33, any supplier of an article containing an SVHC which meets the criteria of Article 57 and is in concentration above 0.1% by weight in the article, shall provide the recipient (e.g. customer) of the article with



sufficient information to allow safe use. At a minimum this information includes the name of the SVHC found in the article. For the past few years, Molex has been collecting a full "Bill of Substances" from our suppliers and this information will make the identification of situations requiring this communication much easier. Molex will actively notify customers upon discovery of any product containing a SVHC above the concentration values. In addition, Molex will update its standard product compliance documentation to include SVHC content as applicable.

Finally, Molex is committed to managing the use of chemical substances in accordance with governmental regulations, industry standards, and customer-specific requirements in order to protect the environment. In accordance with ECHA guidance and consistent with industry practices, Molex does not support analytical testing for SVHC. SVHC information is based on the knowledge of materials used in the finished products and information provided by third parties.

To obtain product-specific environmental compliance information please contact [ProductCompliance@molex.com](mailto:ProductCompliance@molex.com).

### **Operations**

As a company that maintains operations in the EU, Molex must also consider the requirements that cover this aspect of the REACH Regulation. In order to comply, a company must first identify and track the substances used or imported into their operations. With that knowledge, a company must then ensure their chemical suppliers are including the company's specific use of the substance in their registration. One method, currently employed by Molex facilities, to identify the substances used in our operations is through the management of Material Safety Data Sheets (MSDS). These documents are maintained as part of our normal operations and will serve as the basis for our compliance evaluation in our EU operations.

For additional information regarding Molex's environmental initiatives please contact [ECOCARE@molex.com](mailto:ECOCARE@molex.com)