



**Falcon Trunking** Systems Limited

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## Confirmation of REACH Compliance

Falcon Trunking Limited complies with the requirements of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulations, both EU Regulation (EC) Number 1907/2006 (REACH) and UK The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020.

Product stewardship is an important aspect of our supply chain relationships. We maintain an unwavering commitment to the safety of any individual who may have cause to handle our products, including our employees, our customers and the communities in which our products will ultimately operate.

As a provider of products that are defined as “**Articles**” under REACH, Falcon Trunking Systems Limited have established a policy to address all our requirements under REACH as they apply to our suppliers, our customers and our own operations.

Furthermore, our products **do not** contain substances with “**intended release**”.

Having reviewed our requirements we understand that the part of REACH relevant to ourselves is **Article 33 – Communication**. Article 33 of REACH concerns the supply of Articles containing substances of Very High Concern (SVHC’s), and places a requirement on both EU and UK companies to communicate the presence of SVHC’s in products to customers, if they are present within products at >0.1% w/w. As such, Falcon Trunking Systems Limited has to take appropriate steps to assess our products for Substances of Very High Concern (SVHC) and Restricted Materials via a combination of methods, in order to be in compliance with the REACH regulations.

All rigid PVC contains additives called ‘stabilisers’ which are essential for its effective processing during manufacture, in addition they also improve resistance to daylight (UV), weathering and heat aging. Until recently, lead based compounds have been the most common type of stabiliser however these have largely now been phased out by the PVC-u producers.

Based on current and available information, the products we manufacture from **virgin PVC-u** are not expected to contain any SVHC’s or Restricted substances as listed on the candidate list published by ECHA at the following location:

SVHC’s:

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

UK : <https://www.hse.gov.uk/reach/candidate-list.xlsx>

Restricted Substances:

EU: <http://echa.europa.eu/addressing-chemicals-of-concern/restrictions/list-of-restrictions/list-of-restrictions-table>

UK: <https://www.hse.gov.uk/reach/list-of-restrictions.xlsx>

To this end, any presence of SVHC or Restricted materials in those products manufactured entirely from virgin raw material is purely incidental and unintentional.

However, due to our ongoing commitment to incorporate re-cycled PVC-u within some of our products a *possibility* exists, that 'legacy' lead **may** present within certain products.

This places us with a duty under Article 33 to communicate information on substances in articles >0.1% by weight should these substances be present in any supplied product. It should be noted that such lead compounds will not be released during the service life of our products as it remains bound within the polymer matrix and cannot be released in hazardous form.

This **potential** lead substance is legally permitted as we are able advise the recipient (customer) of the name and CAS/EC number of the substance contained within applicable products.

Whilst the above statement is only applicable to those articles containing an element of re-cycled material and therefore does not apply to *all* our product lines, to meet our obligations under REACH, it is included within this *generic* REACH statement. Should you require a *product specific* (and therefore non- product transferable) REACH statement or the CAS/EC number of the substance concerned please contact us.

Falcon Trunking Systems Limited are committed to a monitoring programme for the presence of SVHC's within our products, and in the event of any identification of a specific SVHC within a specific product, we would of course advise you at the earliest opportunity, in accordance with Article 33 of REACH.

I trust the above information provides you with confidence in Falcon Trunking Systems Limited's commitment to REACH and our customers supply chain. In the meantime, should you have any questions on our implementation of REACH within Falcon Trunking Systems Limited, please feel free to contact myself.

Kinburn Bargh  
Director  
Falcon Trunking Systems Limited

Reviewed: 25 May 2021