

NTE Electronics, Inc's REACH Environmental Statement

REACH - Registration, Evaluation, Authorization and Restriction of Chemicals

REACH is an expansive set of European Union regulations that affects all industries doing business in the EU. It basically puts the responsibility for chemical safety on the manufacturers of those chemicals and brings the EU under one unified set of regulations. An important objective of these regulations is to encourage, and in certain situations, ensure chemicals of high concern are replaced with less dangerous chemicals or eliminated.

REACH Regulation

Ongoing draft recommendations for substances of very high concern (SVHC)

The European Chemicals Agency (ECHA) on 1/14/09 developed the first draft recommendation of substances of very high concern (SVHC) for inclusion in Annex XIV. As of June 10, 2022, there are now 224 SVHCs and the list keeps growing.

Health and Safety Executive (HSE)

REACH - NTE Electronics, Inc's Position

NTE Electronics, Inc., being a supplier and distributor of electronic components and supplies, has a limited role in these new regulations. Although electronic components and supplies can be characterized as articles and substances, NTE Electronics, Inc. is not considered a manufacturer under Article 3 of REACH. NTE Electronics, Inc and as such has no responsibility to register any of the components or supplies we distribute.

NTE Electronics, Inc does have the responsibility to communicate SVHC information down the supply chain when provided by the manufacturer, per article 33 of the directive.

NTE Electronics, Inc expects its manufacturers to have robust environmental programs that adhere to the requirements of REACH, identify SVHC to NTE Electronics, Inc, and provide NTE Electronics, Inc with a Safety Data Sheet or other document prescribing the safe handling of their products which contains SVHCs above a concentration of 0.1% (weight by weight) in any of the products homogenous materials. This is not always the case as manufacturers are free to comply or not comply with environmental laws from other countries. Customers wishing to ensure purchased products are free of SVHCs should choose manufacturers that openly and publicly support REACH.

NTE Electronics, Inc has made suppliers aware of our above expectations.

When NTE Electronics, Inc is made aware of the presences of SVHC, we will communicate this to our customers, and provide them with a Safety Datasheet as required by article 33 of REACH. Safety Datasheets are meant to instruct the end-user (customer) on safe handling of the product with the SVHC. In most cases the amount will be

small and encapsulated in the component. Exposure to the SVHC would require grinding the component up. This is not a normal way of handling the product, and a safety datasheet should reflect this distinction.

From NTE Electronics, Inc.'s perspective, REACH is similar to RoHS. NTE Electronics, Inc globally distributes a very wide selection of products and suppliers. As with RoHS, not all the products we sell will be REACH compliant at one time. For this reason, NTE Electronics, Inc, cannot sign a global agreement on REACH Compliance. Customers must take an active role in understanding environmental compliance of product and selecting products accordingly.

October 2022