

Frankenthal, 16.9.2016

REACH compliance statement

All products available from CMC Klebetechnik in the table below contain one substance from the so-called candidate list (list of substances of very high concern or SVHCs, date of issue Jun 20, 2016 with a total of 169 entries). The amount of the substance exceeds the threshold of 0.1% (w/w). With this statement we fulfill our obligations set out in article 33 of regulation (EC) No 1907/2006 (REACH) and forward the letter from our supplier DuPont along the supply chain. The following substance can be found in the below products:

N,N-dimethyl acetamide (DMAc), CAS-No. 127-19-5
concentration range 0.1 to 0.5 % (w/w)

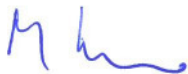
This substance is a residual solvent in the Nomex[®] paper (the concentration refers to the Nomex[®] substrate only). According to DuPont the release rate of DMAc does not pose a risk to human health or the environment (see the original letter by DuPont below). Estimated exposures to downstream workers handling those products and to the general public using the final products are all well below the levels of concern.

Please note that despite the reporting requirement all below products still comply with REACH; our only obligation is to forward information to our customers.

Table of all products concerned:

type	remark
CMC 15603	laminate Kapton [®] HN / Nomex [®] 410 / Kapton [®] HN
CMC 15707	laminate Nomex [®] 410 with CMC 75100 (PTFE adhesive tape)
CMC 19110, CMC 19708, CMC 19714	adhesive tapes based on Nomex [®] 410 and glass cloth
CMC 382XX	flat copper conductors with a Nomex [®] 410 insulation
CMC 65050, CMC 65080, CMC 65130, CMC 65180, CMC 65250, CMC 65300, CMC 65380, CMC 65510	Nomex [®] 410 without adhesive (various thicknesses from 50 to 510 µm)

CMC 65120, CMC 65121, CMC 65122, CMC 65123, CMC 65124, CMC 65220, CMC 65221, CMC 65222, CMC 65223, CMC 65224, CMC 65227, CMC 65229, CMC 65230, CMC 65301, CMC 65842	adhesive tapes based on Nomex® 410 and acrylic adhesive
CMC 65758	adhesive tape based on Nomex® 356 and acrylic adhesive
CMC 65772	adhesive tape based on Nomex® 410 and polyester resin
CMC 65838, CMC 65839	adhesive tapes based on Nomex® 410 and PET film



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REACH Compliance

Position of DuPont for
KEVLAR®, NOMEX®, TENSYLON®

Categories: Staple, Yarn, Paper, Pulp, Floc, Fabrics, Felt, Laminates,
Prepreg, Spunlace, Fibrils

For other categories: Engineered Elastomers
please refer to the bulletin on Preparations

At DuPont, Product Stewardship is an important aspect of our supply chain relationships. We maintain an unwavering commitment to safety for our employees, our contractors, and the communities in which we operate and we share that concern for all who handle our products. As both a manufacturer and importer/exporter of substances¹ covered under REACH, DuPont has established a team to address all of the requirements as they apply to our suppliers, our customers, and our own operations.

The purpose of this communication is to inform you of our current plans:

- DuPont is ensuring that all products sold to our EU and EEA customers by DuPont legal entities in Europe² are in compliance with REACH regulatory requirements, including (pre-)registration³.
- DuPont does not intend to communicate REACH pre-registration numbers based on guidance in CEFIC REACH Industry Preparation Letter No 9.

REACH requires registration for individual substances (on their own or in preparations⁴) greater than 1 metric ton per year produced or imported.

Each importer is responsible for its own compliance with REACH.

The products mentioned above, in our opinion, fulfil the criteria of being classified as “articles”⁵. There are no substances intended to be released from these products under normal or reasonably foreseeable conditions of use⁶.

The above articles sold under KEVLAR® to our current knowledge do not contain substances, above the legal threshold, that are on the ‘Candidate List’ of Substances of Very High Concern (SVHC) as published on the ECHA website - latest on 15.06.2015.

Articles sold under NOMEX® may contain N,N-dimethylacetamide (DMAc) EINECS 204-826-4 in a concentration above 0.1%w/w. Additional information can be found here:

http://www2.dupont.com/REACH/en_US/assets/downloads/PDFs/AFS/DPT_AFS_Reach_Compliance_Bulletin.pdf

Under the above conditions, articles are exempt from registration under REACH.

To our current knowledge, all substances contained in the above articles are in compliance with the conditions of restrictions of REACH Annex XVII. DuPont will communicate in due course any changes due to future amendments of Annex XVII that may impact the manufacture, placing on the market or use of the substances contained.

To understand fully the obligations that you will have under REACH, we recommend that you consult the REACH web site at <http://echa.europa.eu>

DuPont REACH web site: <http://reach.dupont.com>

¹ Substance: a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition (REACH, Art. 3.1).

² This includes the DuPont legal entities in the EU/EEA, as well as, DuPont de Nemours International S.A. and DuPont International Operations Sàrl.

³ DuPont, for its products and brands, has submitted (pre-)registration files to ECHA for the substances requiring (pre-)registration that are manufactured/imported by DuPont. Receipt of those files has been acknowledged by ECHA. As per today's knowledge, the substances that DuPont is purchasing on the European market have been (pre-)registered by their respective manufacturers or importers.

⁴ Preparation: means a mixture or solution composed of two or more substances (REACH, Art. 3.2).

⁵ Article: means 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 (REACH, Art. 3.3).

⁶ As per REACH Art. 7.1 b.

This information is based on our current level of knowledge and expresses only our intention. It does not constitute a binding obligation. Whilst the information is provided in good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

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February 15, 2016

Reference:

Update on residual DMAc content in Nomex® brand paper used in electrical applications

This is an update on DuPont's progress on lowering the DMAc content in Nomex® paper used for electrical insulation applications. We are pleased to inform you that great progress is being made, and we anticipate our transition to Nomex® papers with DMAc content below the REACH notification threshold will be complete by 4th quarter 2016. REACH Article 33 requires importers of articles into the EU to inform their customers about Substances of Very High Concern (SVHC) content above 0.1 wt%. DMAc, a process impurity used in the production of meta-aramid fiber, was labeled as a SVHC in December 2011.

DuPont developed and is implementing a process technology upgrade to the Nomex® fiber production facilities to improve the fiber washing process, reducing the DMAc residual content to less than 0.1 wt%. As a result, the Nomex® papers made from these fibers will also not exceed the REACH notification threshold of 0.1%wt DMAc residual content. The process technology upgrade does not change the fiber properties. Therefore, the Nomex® paper manufacturing process, the product specifications, product codes and product description will remain unchanged.

When the transition is complete later this year, we will provide written confirmation to our direct customers supplying the electrical industry. As noted above, we anticipate that the transition for Nomex® papers shipped from DuPont to be complete by 4th quarter 2016. In the meantime, DMAc related information will continue to be clearly communicated on the shipping documents.

Please do not hesitate to contact us, should you have any additional questions.

A handwritten signature in black ink, appearing to read "A Metzger".

Alexander M. Metzger
Regulatory Compliance Leader EMEA
DuPont Protection Solutions

A handwritten signature in black ink, appearing to read "Matt Reinhardt".

Matt Reinhardt
Global Manager Energy Solutions
DuPont Protection Solutions