

TECHNICAL BULLETIN

Date: January 23, 2024
Subject: Compliance of Armacell, LLC Component Foam products to REACH 240
Products: OleCell® & FillPro®

The REACH regulation has multiple parts to consider. Below is some general information about the REACH regulation.

REACH	Registration, Evaluation, Authorization and Restriction of Chemicals - EC No.1907/2006	The primary document / regulation (defines impacted parties and describes lists of chemicals of varying levels of restriction).
Annex XIV	List Of Substances Subject To Authorization	A list of substances that are considered restricted but may be allowed under special approval.
Annex XVII	Restrictions On The Manufacture, Placing On The Market And Use Of Certain Dangerous Substances, Mixtures And Articles	A list of substances that are considered restricted with no approval permitted.
SVHC	Substances Of Very High Concern	Substances that are considered hazardous and listed as candidates of the authorization list (Annex XIV).

► All of the Armacell polyolefin Component Foam products are classified as “articles” according to Title 29 of the Code of Federal Regulations, OSHA Part 1910.1200®, page 463. According to REACH the definition of “article” is as follows: “Article means 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))”.

► Articles as defined by REACH regulations are exempt from registration as long as they are not intended to release a chemical substance (REACH, Article 7 [1 & 2]). To the best of our knowledge, we believe that all of our foam products meet the definition of “article” according to REACH.

► Details regarding REACH listings are kept up to date and made available on the European Chemicals Agency website:

Annex XIV: <https://echa.europa.eu/authorisation-list>
Annex XVII: <https://echa.europa.eu/substances-restricted-under-reach>
SVHC: <https://echa.europa.eu/candidate-list-table>

► **Declaration:** Excluding the additional restrictions placed on products intended for use in child toy or child care applications, no chemicals or substances listed in REACH (EC No. 1907/2006), including Annex XIV, Annex XVII, and the SVHC list, are intentionally utilized with the intent of substance release under normal end use applications in the formulation process of the OleCell® or FillPro® product lines manufactured in Brampton, ON.

► **Child Toy or Child Care Applications:** Annex XVII includes additional entries with specific substance restrictions on materials intended for use in children articles. Information specific to this end use can be provided by an Armacell Component Foam Technical Manager.

If you have any questions, or need additional information concerning Armacell Component Foam products, please contact the component foam technical management & chemical regulatory compliance team at Armacell:

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