



DUTEK is a Contract Manufacturer, and as such, utilizes only components specified directly by you, the Customer. DUTEK utilizes only components specified directly by you, the Customer. Therefore, we can only provide the detail on chemicals/materials we add to the assembly in the manufacturing process, which, in most cases, is solder or possibly some marking inks. We only use components specifically called out on the supplied Bill of Materials (BOM) for your product. The REACH compliance for the components called out on the BOM is the responsibility of the design function.

Under the structure of the REACH Regulation, DUTEK is a manufacturer and supplier of “articles” to our domestic customers who may, in turn, export product containing DUTEK articles to the EU. We do not manufacture or supply “substances” or “preparations” and our articles do not involve the “intentional release of substances”.

The publication of the “candidate list” (Article 59(10) of the REACH Regulation) and Article 33(1), obliges suppliers of articles to inform their downstream customers of the presence in the article of substances of very high concern included in the candidate list above a concentration of 0.1 % weight by weight (w/w). Article suppliers have to provide their customers with sufficient information available to them to allow safe use, including, as a minimum, the name of the substance. The current candidate list can be consulted at the following address: <http://echa.europa.eu/candidate-list-table>

Based on the information we received from our upstream suppliers, Kester Solder and AIM Solder, and an examination of the substances utilized in our manufacturing processes, none of the currently listed substances are present in the materials or substances DUTEK adds to the articles we supply to your company or in the packaging. Accordingly, there is no registration or pre-registration requirement for the products we supply to you.

With regard to the individual components, specified by your company Purchase Order or on the BOM for REACH compliant products, all are REACH compliant *only when the individual components specified on your BOM are REACH compliant*. We order only to the specified manufacturer’s part numbers as called out on the client’s BOM. We verify, upon receipt, that the parts received match the parts ordered. The individual components’ REACH compliance is not verified. It is assumed that REACH compliance was taken into consideration when the manufacturer and part numbers were added to the BOM. If you need further information on the REACH status for individual components called out on your BOM, the detailed information you are seeking may be obtainable directly from the component manufacturers.

The determination on the presence of Substances of Very High Concern (SVHC), in DUTEK articles supplied to you, is based upon information which DUTEK believes is reliable; however, the information is provided without representation of warranty, expressed or implied, regarding accuracy or correctness.

“Companies established outside the EU: If you are a company established outside the EU, you are not bound by the obligations of REACH, even if you export their products into the customs territory of the European Union. The responsibility for fulfilling the requirements of REACH, such as pre-registration or registration lies with the importers established in the European Union, or with the only representative of a non-EU manufacturer established in the European Union.” (from <http://echa.europa.eu/regulations/reach/understanding-reach>)

Sincerely,

Greg Skodacek,
Director of Quality and Regulatory Affairs