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SUBJECT: Registration, Evaluation and Authorization of Chemicals (REACH)

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) was first released. This Regulation establishes specific duties and obligations for companies in the European Union (EU) that manufacture or import substances on their own, in preparations for these articles.

This letter establishes the opinion of Jefferson Electric regarding the status, under the current European Union ("EU") Regulations on Registration, Evaluation, Authorization, and Restriction of Chemical Substances ("REACH")

REACH does not apply to manufactured products which are referred to as "completed articles". Substances (chemicals) are subject to REACH registration, **NOT** products.

In addition, Articles are exempt from the REACH requirements if (a) the Article does not contain a substance of very high concern or candidate substance in an amount exceeding 0.1% weight by weight, and (b) if substances present in the Article in excess of 1 ton per year per importer are not expected nor intended to be released.

Based on communication with our raw material suppliers, we conclude that to the best of our knowledge our products requiring Reach compliance do not contain any of the currently listed SVHC in concentrations of 0.1% or above.

Accordingly, we foresee no registration or pre-registration requirement for the products we supply.

Sincerely,

Eric Jaeger
Director of Product Development
Jefferson Electric