

Memo

To: Tadiran Batteries Ltd. Customers

From: M. Babai, Quality Manager

Subject: Implementation of the REACH Regulation by Tadiran Batteries

On 1 June 2007 Regulation (EC) No 1907/2006 concerning Registration, Evaluation, Authorization and Restriction of Chemicals ("REACH" for short) came into force.

REACH contains the following regulations:

1. From 1 June 2008, manufacturers of substances, and importers of substances as such or of substances in preparations (mixtures) into the European Community (EC) and the European Economic Area (EEA), must register these substances with the European Chemicals Agency if the substances in question are manufactured or imported in quantities of at least 1 t/a and if they are not substances that are exempted from compulsory registration. So-called "phase-in substances" – these are, for example, substances that are shown on the existing substances list EINECS – can be pre-registered between 1 June 2008 and 1 December 2008. Pre-registered substances do not have to be registered until later, depending on the quantity manufactured/imported.
2. Suppliers of substances and preparations must provide the recipient with either a safety data sheet (Article 31) or safety information (Article 32). In certain cases, the safety data sheet will be supplemented by an annex ("extended safety data sheet") showing the relevant exposure scenarios.
3. Manufacturers and importers of articles that contain more than 0.1 mass percent per article of a substance on the "candidate list" shall provide the professional recipient and on request a consumer of the article with sufficient information to allow safe use of the article, including, as a minimum, the name of that substance. If all these articles contain more than 1 t/a a notification to the European Chemicals Agency (EchA) is necessary, however, not before 1 June 2011.
4. From June 1st 2008, users of chemicals (substances and preparations/mixtures) – so-called "downstream users" – will have to comply with other obligations, but in some cases only after they have received an extended safety data sheet. Downstream users can provide appropriate information so as to assist the manufacturers of substances and importers of substances and preparations in registering them.

Quality Department

Implementation by Tadiran

Tadiran Lithium Batteries are articles (not chemicals) which are not intended to release any substance under normal and reasonably foreseeable conditions of use. Consequently, the obligations in No. 1 and 2 above are not relevant here.

The "candidate list" has been published firstly on 28 October 2008. The relevant obligations are described under No.3. As soon as the relevant data are available from the supply chain we keep you informed. However, as far as we know, at present, our articles do not currently contain any substances above 0.1 mass-percent per product that are listed on the first candidate list.

Through communication with our chemicals suppliers we will try to safeguard the delivery of all chemicals which are necessary for us.

This statement is based on the ZVEI Info 36/2008 guide to responding to enquires about REACH.



Dr. M. Babai
Quality Manager, Tadiran Batteries Ltd.