



Olen, October 12, 2023

Re: The approach of Novatech International to the REACH and CLP Regulation with regard for the Tec7 products

Dear Sir or Madam,

TEC7, BIKE7 and Green7 are directly affected by the REACH Regulation (EC) No. 1907/2006 and CLP Regulation (EC) No. 1272/2008. As an importer/industrial downstream-user of chemicals, Novatech International need to ensure that the products will be available to us in the future.

We confirm that according to our current information all products supplied to you do comply with REACH and CLP requirements. To this end, we follow up on:

- **Registration requirements of substances contained in our products**

As downstream user, we rely on our upstream suppliers to comply with the registration requirements and have procedures in place to check REACH compliancy. As required by REACH you will find the registration numbers in the respective chapters of the SDS.

As importer, there are currently no registration obligations for Novatech International. Volumes are being tracked on a regular basis.

- **The Candidate List - <https://echa.europa.eu/candidate-list-table>**

We have no knowledge of any product containing a substance of very high concern (SVHC). If this will be the case in the future, we will communicate accordingly via our SDS or PSIS.

- **Annex XIV - List of Substances Subject to Authorization**

We have no knowledge of any product containing a substance of very high concern (SVHC) on Annex XIV. If this will be the case in the future, we will undertake the necessary actions to ensure REACH compliancy of our products and communicate accordingly via our SDS or PSIS.

- **Annex XVII - Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles**

Where required, we undertake the necessary actions to ensure REACH compliancy of our products and communicate accordingly via our SDS or PSIS.

- **New relevant information**

Our downstream users are asked to communicate uses to us not mentioned on the SDS as well as new information on hazards or inappropriate risk management measures in the SDS. This information must be immediately communicated further upstream in order to integrate relevant safety information in the registration dossier and the SDS.

- **The safety data sheets**

SDS's will be updated in due time according to Annex II of REACH and all its amendments.

- **Classification and labeling**

The content of the SDS's and the labels will be updated in due time according to CLP Regulation (EC) No. 1272/2008 and its ATP's.

We hope this information explains clearly how Novatech International approaches REACH and CLP and that it reassures you that we will be able to continue the supply our products in compliance with these Regulations.

Bram Starckx

A handwritten signature in blue ink, appearing to read "Bram Starckx", on a white background.

Technology Manager