

REACH Overview and Statement

What is REACH?

REACH' is an abbreviated term for Regulation (EC) 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH Regulation). The REACH Regulation has been amended a number of times since coming into force, and furthermore several pieces of implementing legislation have been introduced to ensure its operation.

REACH came into force in the UK on 1st June 2007.

UK - EU REACH

Under the European Union (Withdrawal) Act 2018, the EU REACH Regulation was brought into UK law on 1 January 2021 and is known as UK REACH.

REACH, and related legislation, were replicated in the UK with the changes needed to make it operable in a domestic context. The key principles of the EU REACH Regulation were retained in the UK REACH Regulation.

The UK REACH and the EU REACH regulations operate independently from each other.

UK REACH regulates chemicals placed on the market in GB, whereas under the terms of the Northern Ireland Protocol, EU REACH continues to apply in Northern Ireland.

What are the aims of the UK and EU REACH

REACH cover chemical substances in preparations or in articles intended to be released in the environment. Both regulations aim to:

- provide a high level of protection of human health and the environment from the use of chemicals
- make the people who place chemicals on the market (manufacturers and importers) responsible for understanding and managing the risks associated with their use
- promote the use of alternative methods for the assessment of the hazardous properties of substances - for example quantitative structure-activity relationships (QSAR) and read across.

How do the UK and the EU REACH regulations affect Scolmore Group?

Scolmore Group does not manufacture or add any chemicals to the products it supplies, therefore according to both UK and EU REACH regulations, Scolmore Group and its subsidiary companies can be classed as importers or distributors of “articles”.

What are SHVC?

In general terms, SVHC are substances that have hazards with serious consequences. For example, they cause cancer, or they have other hazardous properties and/or remain in the environment for a long time with their amounts in animals gradually building up.

The criteria to identify the above substances are laid down in Article 57 of the EU REACH as well as in the correspondent Article 57 of the UK REACH.

Substances meeting these criteria may be placed on one or both of two lists that are defined in the UK REACH Regulation as well as in the EU REACH Regulation: the so called 'Candidate List' and the 'Authorisation List' (Annex 13).

The EU candidate lists of SVHC are continually updated and published on the ECHA website <https://echa.europa.eu/candidate-list-table>

The correspondent UK candidate lists of SHVC are continually updated on <https://www.hse.gov.uk/reach/candidate-list.xlsx>

Should any of Scolmore Group's products be registered with the ECHA / SCIP?

Any company manufacturing or importing into the EU a substance on its own, in a preparation (mixture of substances), or intentionally released from articles (finished manufactured goods) at or above 1 tonne per year may have to register it with ECHA.

The revised WFD (Waste Frame Directive) gave ECHA the tasks to develop a database with information on SVCHs on the Candidate List – called the SCIP Database [Substances of Concern In articles as such or in complex objects (Products)]. It requires companies that produce, import or supply articles containing SVHCs on the Candidate List in a concentration above 0.1% weight by weight (w/w) to submit information related to these articles placed on the EU market to the SCIP database. This obligation is for articles produced in the EU or imported from non-EU countries.

After tests conducted by our suppliers, we can conclude that releases from our products are not likely to occur at levels that would require registration under EU REACH. Article registration requirements do not therefore apply to Scolmore and its subsidiaries.

Scolmore Group REACH COMPLIANCE STATEMENT

As part of our ongoing compliance commitment, Scolmore International Limited (highest parent of the Scolmore Group) as well as its subsidiaries Ovia, Elite Security Products (ESP), Unicrimp and Sangamo, have undertaken a process to identify which, if any, substances of very high concern (SVHCs), meeting the criteria set out in Article 57 of the UK and EU REACH Regulations and included on the UK and EU REACH “Candidate List”, are contained within the products we supply to you and in what concentrations.

Additionally, we are monitoring the ongoing amendments to both regulations also with reference to restrictions related to specific applications.

As a result of this exercise, we have received no notification of any breach to the above regulations and we confirm that, to the best of our knowledge, the products we currently supply do not contain any SVHCs included on the Candidate List in concentrations above 0.1 % (w/w) and are compliant with Annex XVII restrictions.

The information is provided to the best of our knowledge and is based on supplier certifications and our own independent tests.

In the event that new information becomes available that would necessitate additional measures we will inform our customers as soon as possible via this webpage.

Disclaimer

All information in this statement is provided to the best of Scolmore Group's and its subsidiaries companies' knowledge at the time of preparation. This statement is provided for information purposes only. Scolmore Group provides this information without warranties of any kind, neither expressed nor implied, including but not limited to warranties for a particular purpose. Scolmore Group does not warrant that the content will be error free. Our declaration is based on the feedback received from our suppliers.

Both UK and EU REACH regulations do not require a full content disclosure and preserve the producer's rights to trade secrets. It is our intention to continue to comply with the spirit of the REACH regulations as well as the letter of the law.

Mark Flanagan

Technical Director

Scolmore International Ltd

25th November 2025