## Quicksilver Controls, Inc.



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REACH - Registration, Evaluation, Authorization, and Restriction of Chemicals 25 Feb 2010

Under the REACH regulations, QuickSilver Controls, Inc.:

- Does not sell products in which the chemicals are used separately, but only in the form of "articles"
- 2) Does not sell products which intentionally release chemicals from articles (i.e. no perfumes, scenting, etc.)
- 3) Does not ship in excess of 1 tonne (1000 kg) of any substance into the EC.

According to Reach information on the web:

http://echa.europa.eu/reach/reach\_faq\_en.asp?topic=subartic&#subartic

Section 8, (as of 25 February 2010) Requirements for substances in articles

The registration requirement for substances in articles according to Article 7(1) of the REACH Regulation applies only if all of the following conditions deriving from Articles 7(1) and 7(6) are met:

- The substance is intended to be released during norrmal and reasonable foreseeable conditions of use; and
- The total amount of the substance present in the articles exceeds one tonne per producer or importer per year; and
- The substance has not yet been registered for that specific use.

As we do not intend substances to be released during normal and reasonable foreseeable conditions, and we do not import more than one tonne of any substance into the EC, to my understanding of the regulations, QCI does not have a need to register substances.

With respect to ElCam as an importer in the EC, (QCI having no place of business in the EC) you do not import in excess of one tonne of products (total) from QCI (producer), so to my understanding, materials from us do not need to be registered. If you come to the point of exceeding 1 tonne of material per year, then we should quickly be able to subtract the aluminum, steel, and copper, already registered for use in structural, magnet, and electronic applications from the total mass and again be far from requirements for registering the trace substances in the integrated circuits or capacitors, et al.

Please notify QCI if your understanding of these regulations differs from the above descriptions.

Sincerely.

Donald P. Labriola II P.E.

President.

QuickSilver Controls, Inc.