

Certificate of REACH Compliance Communication of Substances of Very High Concern (SVHC)

REACH, the regulation for the registration, evaluation, authorization, and restriction of chemicals (EC) No. 1907/2006 of December 18, 2006 entered into force on June 1, 2007. We hereby present information on implications and duties resulting from REACH with regards to the products of the Mitutoyo brand sold by Mitutoyo Europe GmbH and its affiliates and distributors. Our German affiliate "KOMEG Industrielle Messtechnik GmbH", a developer, manufacturer, and distributor of production technology and coordinate metrology components and systems, has issued a separate statement.

Mitutoyo production facilities outside of the European Union (EU)

Mitutoyo manufactures measuring devices and machines primarily in Japan (Mitutoyo Corporation, Japan [M-J]), but also in other locations outside of the EU or European Economic Area (EEA). These manufacturers are not directly obliged to follow REACH guidelines.

Mitutoyo production facilities within the EU

There are currently no production facilities for Mitutoyo products within the EU or EEA.

Mitutoyo Europe GmbH (MEU)

MEU is the European headquarters of the Mitutoyo Group. MEU is a Sales and Service Company for Mitutoyo products with its head office in Neuss, Germany. MEU imports and distributes ready-to-sell measuring devices, i.e. stand-alone products with independent functions. This is also true for so-called built-in measuring instruments. MEU therefore does not introduce any products to the market that might, in a legal sense, "be incorporated" into other products.

MEU imports products and introduces them to local markets for EU and EEA states with subsidiaries in Germany, the United Kingdom, France, Italy, the Netherlands, Belgium, Sweden, Switzerland, Hungary, Poland, and the Czech Republic. Thus, MEU functions as the addressee of the REACH regulation.

Mitutoyo Distributors within the EU

All affiliates and other distributors of MEU involved in sales of Mitutoyo articles, only procure finished products within the EU. Therefore, they have no noteworthy obligations concerning REACH and may trust that the products were manufactured according to REACH regulations and that they have already been subjected to the REACH procedure.

Duty to Register Substances

Only substances must be registered, not preparations or products. The duty to register "substances in products" only applies when a number of conditions are being met simultaneously. Investigations have shown that at least one of these conditions, namely "*Release under normal or reasonably foreseeable conditions of use*", is not met on a regular basis by Mitutoyo products. As permitted, a registration by MEU does not take place.

Duty to Notify

According to the provisions of Article 7 (2) and (3) of REACH, MEU is not required to notify. Investigations have shown that at least one of these conditions, namely "*the substance is present in those articles in quantities totaling over 1 ton per ... importer per year*", is not met by MEU.

Reporting Requirements for Products containing SVHC

According to Article 33 of REACH, MEU is obliged to provide information on products containing SVHC in quantities exceeding 0.1 % by weight (w/w).

Products containing SVHC

Certain original Mitutoyo products have been identified to contain SVHC in quantities exceeding 0.1% w/w. An updated list of affected articles including article numbers, component specifications, images, SVHC name and CAS can be found online at www.mitutoyo.eu/reach. The list also contains information on the safe use of the articles. Upon request, we will gladly provide our customers with a printed copy as well.

To the best of our knowledge and based on information from our suppliers, the remaining articles and packaging materials either contain no SVHC at all or only in concentrations that fall below the exemption limits. If there are any changes, MEU will issue notifications immediately.

Safety Data Sheets & Information about the Preparations

Upon request, we also provide our customers with safety data sheets for shipped preparations or any other information about preparations according to Article 32 of REACH. In the case of relevant amendments (Article 31 No. 9 of REACH), we strive to update the safety data sheets without delay and provide them to our customers. However, please note that we need our suppliers' prompt assistance in this matter as Mitutoyo neither manufactures nor formulates the preparations. There is no need to create safety data sheets for our products.

Delivery Capacity

We are not aware of nor do we foresee any instances that would lead to restrictions regarding delivery due to REACH regulations.

REACH Contact

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