

SUSPA Interim Summary, as per 25th January 2024

External interested parties can be provided with this document.

Summary and positioning according to the activities and analyses by the REACH working group.
Valid for SUSPA GmbH in Altdorf and Sulzbach as well as SUSPA-Bor:

1. SUSPA does not manufacture any substances or preparations.
2. SUSPA does not import any substances or preparations from outside the EU.
3. Nearly all of the procured auxiliary and operating materials (A&O) are preparations within the sense of REACH. A few auxiliary and operating materials are substances that are essentially used for laboratory requirements.
4. SUSPA procures PRODUCTS from within and outside of the EU from which nothing is intended to be released. For their part, these procured PRODUCTS become part of the PRODUCTS produced by SUSPA.
5. For its part, SUSPA manufactures PRODUCTS from which nothing is intended to be released.

➔ **SUSPA is thus a downstream user in the sense of the REACH regulation for almost all of the substances to be considered.**

➔ According to the current status of examination (23/01/2024), there are no registration requirements for SUSPA GmbH with locations in Altdorf and Sulzbach as well as the location of Bor in the Czech Republic!

I SUSPA activities related to registration:

SUSPA is dependent on the upstream supplier making the necessary substance registrations. For their part, the SUSPA suppliers are usually also "only" product manufacturers or preparers and usually do not have to register themselves.

As a downstream user, SUSPA called on select suppliers of preparations (usually with annual delivery quantities > 200 kg) during the pre-registration phase to ensure the pre-registration status or the registration status.

I SUSPA activities relating to the substances of the REACH candidate list (SVHC):

SUSPA complies with the information requirements regarding substances of the candidate list (SVHC = Substances of Very High Concern) required in article 33 of the REACH regulation. This requires a continuous observation process, since the candidate list is currently growing steadily.

As per **January 2024** (list status per 23/01/2024), the SVHC candidate list shows 240 entries.

SUSPA is also dependent on active information from the suppliers with respect to the SVHC.

The REACH regulation itself requires all of our suppliers to actively inform us if SVHC are contained in the purchased products with a weight proportion greater than 0.1%.

New suppliers are obliged to comply with the REACH requirements by means of the SUSPA quality assurance agreement.

Furthermore, SUSPA requires REACH confirmations from the suppliers for new procured products as part of the supplier quality planning.

If material data is maintained via the IMDS (International Material Data System) (e.g. all automotive products), the suppliers have to specify the pure substances and therefore also the SVHC in the IMDS. Based on this information, SUSPA is informed whether any SVHC are contained and can check whether SVHC are present in the manufactured items with a weight proportion greater than 0.1%.

I SVHC Resume as per 25th January 2024:

To this day, SUSPA has no information that SVHC with a weight proportion > 0.1% are present in the products made by SUSPA considering the associated interpretation explanations.

Based on current knowledge, SUSPA **does not have to meet notification requirements** to the ECHA according to article 7(2) of the REACH regulation

On behalf of the SUSPA REACH taskforce, Altdorf, on January 25, 2024

Best regards,

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