

REACH Declaration

Comus Technology BV in Heerlen, acting under the name Coto Technology and formerly known as Coto Technology BV, is a producer of reedswitches. Reedswitches are non-chemical articles consisting mainly of nickel-iron and glass. Reedswitches do not release any substances under normal and reasonable foreseeable conditions of use. Therefore, Comus Technology BV is according to the REACH legislation a downstream user. This means there is no obligation for the registration of substances present in reedswitches nor for producing material safety data sheets (MSDS).

As in many cases, a company can have multiple roles within the REACH legislation. This is also the case with Comus Technology BV. Besides being a downstream user Comus Technology BV is also an importer of substances, because Comus Technology BV imports substances outside the EU. This means Comus Technology BV has the role of importer under REACH and may have to register said substances. In the case where this applies, Comus Technology BV has done a preregistration and will follow all obligations for further registration in the future, when necessary.

As to REACH article 33, duty to communicate information on substances in articles, there are no SVHC present in all of the reedswitches produced by Comus Technology BV. This applies to the SVHC (substances of very high concern) included in the candidate list¹ (as published on 2008-10-28) in a concentration above 0.1 % weight by weight of the product.

Comus Technology BV tries to fulfill all obligations within the REACH legislation not only for itself but also for our suppliers. This is done in our own interest and to guarantee the high level of product safety for our customers. Suppliers failing to conform to REACH can not qualify as a supplier to Comus Technology BV.

Comus Technology BV



Rob Cremers, EHS manager

¹ List of substances of very high concern for potential inclusion in REACH Annex XIV, which lists substances subject to authorization (REACH Article 59). http://echa.europa.eu/chem_data/candidate_list_en.asp