ERKLÆRING OM MATERIALECOMPLIANCE (REACH, POPs, PFAS & RoHS)

Dato: 27/10-2026

1. Vink Plast's rolle i værdikæden

Vink Plast distribuerer og bearbejder plasthalvfabrikata og teknisk plast. Hovedparten af vores produkter fremstilles i EU.
I henhold til EU's kemikalielovgivning agerer Vink Plast primært som distributør og downstream-bruger af **artikler/genstande** (*articles*) fremstillet af polymerer og plastcompounds. Vi overvåger løbende lovgivningsmæssige ændringer i tæt dialog med vores råvareleverandører for at sikre, at vores produkter altid overholder gældende EU-standarder.

2. REACH-forordningen (EF nr. 1907/2006)

Polymerer er i sig selv undtaget fra registrering under REACH, mens monomerer og kemiske additiver reguleres. Som forhandler og bearbejder af artikler er Vink Plast ikke underlagt selvstændig registreringspligt, men vi overholder alle informations- og notifikationsforpligtelser i værdikæden:

- **Artikel 33 (Kandidatlisten / SVHC):**
  Ud fra modtagne oplysninger fra vores råvareproducenter bekræfter vi, at vores standardprodukter ikke indeholder stoffer fra ECHA's kandidatliste over særligt problematiske stoffer (*Substances of Very High Concern* – SVHC) i en koncentration over 0,1 vægtprocent (w/w), med **følgende specifikke undtagelser:**

  - **PVC-U (massiv PVC)**
  - **PVC-C**
  - **Opskummet PVC**

  Disse materialer indeholder:
  - **Dioctyltin-derivater (DOTE)** | CAS-nr.: 15571-58-1 (> 0,1 % w/w).
    Stoffet fungerer som varmestabilisator og er bundet i polymerstrukturen. Det frigives ikke ved normal og forudsigelig håndtering eller mekanisk bearbejdning. Hvor det er påkrævet, er de nødvendige SCIP-notifikationer foretaget.

- **Artikel 67 / Bilag XVII (Restriktioner):**
  De markedsførte produkter overholder gældende begrænsninger for fremstilling, markedsføring og anvendelse fastsat i REACH Bilag XVII.

3. POPs-forordningen (EU 2019/1021)

Vink Plast overholder kravene i Europa-Parlamentets og Rådets forordning (EU) 2019/1021 om persistente organiske miljøgifte (*Persistent Organic Pollutants*).
Baseret på leverandørdata erklærer vi, at vores produkter overholder forbud og gældende grænseværdier for utilsigtede sporforureninger (UTC) for stoffer opført i **Bilag I** (herunder bromerede flammehæmmere som PBDE, HBCD, Dechlorane Plus samt SCCP og regulerede fluorforbindelser som PFOS, PFOA og PFHxS).

4. PFAS (Per- og polyfluoralkylstoffer)

PFAS dækker over en bred gruppe af fluorholdige stoffer:

- **Eksisterende lovkrav:** Specifikke PFAS-forbindelser (f.eks. PFOS, PFOA, PFHxS, C9–C14 PFCAs og beslægtede stoffer) er allerede underlagt forbud og grænseværdier via POPs-forordningen og REACH Bilag XVII, hvilket vores produkter overholder.
- **Fluorpolymerer i sortimentet:** Vink Plast forhandler og bearbejder tekniske fluorpolymerer (herunder **PTFE, PVDF, FEP, PFA**). Disse materialer er kemisk inerte, højtydende artikler, men de falder teknisk set ind under den brede OECD-definition af PFAS.
- **Kommende universelle REACH-restriktioner:** Restriktionsforslaget initieret af Danmark, Tyskland, Holland, Norge og Sverige vedrørende en bred udfasning af PFAS behandles fortsat af ECHA's videnskabelige komitéer (RAC og SEAC). Vi følger processen og overgangsordningerne tæt for at kunne rådgive kunder om eventuelle fremtidige substitutioner.

5. RoHS-direktivet (2011/65/EU m. ændringsdirektiv EU 2015/863 & EU 2019/1846)

Vi bekræfter hermed ud fra vores leverandøroplysninger, at nedenstående 10 stoffer (omfattet af de uofficielle betegnelser RoHS 2 og RoHS 3) hverken bevidst tilsættes eller overskrider de fastsatte grænseværdier i vores plasthalvfabrikata:

1. Cadmium (Cd) (< 0,01 %)
2. Bly (Pb) (< 0,1 %)
3. Kviksølv (Hg) (< 0,1 %)
4. Hexavalent chrom (Cr^{6+}) (< 0,1 %)
5. Polybromerede biphenyler (PBB) (< 0,1 %)
6. Polybromerede diphenylethere (PBDE) (< 0,1 %)
7. Bis(2-ethylhexyl)phthalat (DEHP) (< 0,1 %)
8. Butylbenzylphthalat (BBP) (< 0,1 %)
9. Dibutylphthalat (DBP) (< 0,1 %)
10. Diisobutylphthalat (DIBP) (< 0,1 %)

6. Forbehold og gyldighed

Denne erklæring er udarbejdet efter vores bedste viden baseret på teknisk dokumentation og erklæringer modtaget fra vores råvareproducenter. Da Vink Plast ikke udfører rutinemæssige kemiske analyser på indkomne råvarer eller færdige emner, kan ubevidst sporforurening fra procesudstyr eller eksterne værdikædeled ikke fuldstændigt udelukkes.
Erklæringen revideres systematisk ved væsentlige ændringer i lovgivningen (f.eks. tilføjelser til ECHA's SVHC-kandidatliste eller ændringer i POPs-bilagene) samt ved ændringer i råvaresammensætningen. Gældende version er tilgængelig på **www.vink.dk**.

På vegne af Vink Plast:

Sean Quint

Sean Quint
QHSE Manager
Vink Plast

Begrænsninger

Vink Plast anser ovenstående oplysninger for at være korrekte. Oplysningerne er baseret på data indhentet gennem løbende due diligence vedrørende varer og materialer fra tredjepartsleverandører. Vink Plast stiller disse oplysninger til rådighed, som de foreligger ("as is"), uden nogen form for udtrykkelig eller stiltiende garanti. Vink Plast forbeholder sig retten til at opdatere og ændre denne meddelelse, når det skønnes nødvendigt eller hensigtsmæssigt. De er velkommen til at anmode om yderligere oplysninger.

GENERAL MATERIAL COMPLIANCE DECLARATION (REACH, POPs, PFAS & RoHS)

Date: 12/10-2026

1. Vink Plast's in the Supply Chain

Vink Plast distributes and processes semi-finished plastic products and engineering plastics. The majority of our products are manufactured within the European Union.
Under European Union chemicals legislation, Vink Plast acts primarily as a distributor and downstream user of **articles** manufactured from polymers and plastic compounds. We continuously monitor legislative updates in close collaboration with our raw material suppliers to ensure our products remain compliant with current EU regulations and standards.

2. REACH Regulation (EC No. 1907/2006)

Polymers are exempt from registration under REACH, whereas monomers and non-polymeric chemical additives are subject to regulation. As a distributor and fabricator of articles, Vink Plast is not subject to direct registration obligations; however, we fulfill all communication and notification duties throughout the supply chain:

- **Article 33 (Candidate List / SVHC):**
  Based on declarations and technical documentation received from our raw material manufacturers, we confirm that our standard stock products do not contain substances listed on the ECHA Candidate List of Substances of Very High Concern (SVHC) in concentrations exceeding 0.1% by weight (w/w), with the **following specific exceptions:**

  - **PVC-U (Rigid / Unplasticized PVC)**
  - **PVC-C (Chlorinated PVC)**
  - **Foamed / Cellular PVC**

    These specific materials contain:
    - **Dioctyltin derivatives (DOTE)** | CAS No.: 15571-58-1 (> 0.1% w/w).
      This substance acts as a thermal stabilizer chemically embedded into the polymer matrix. It is not released under standard, reasonably foreseeable handling conditions or mechanical processing. Where mandatory, appropriate submissions to the SCIP database have been completed.

- **Article 67 / Annex XVII (Restrictions):**
  The products placed on the market comply with all applicable restrictions regarding manufacture, marketing, and use as specified in REACH Annex XVII.

3. POPs Regulation (EU 2019/1021)

Vink Plast complies with Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants (POPs).
Based on supplier declarations, our products comply with the prohibitions and applicable Unintentional Trace Contaminant (UTC) thresholds for substances listed in **Annex I** (including brominated flame retardants such as PBDEs, HBCD, Dechlorane Plus, short-chain chlorinated paraffins (SCCPs), as well as regulated fluorinated substances such as PFOS, PFOA, PFHxS, and their related compounds).

4. PFAS (Per- and Polyfluoroalkyl Substances)

PFAS covers a wide chemical family of fluorinated substances:

- **Current Regulatory Restrictions:** Specific PFAS compounds (e.g., PFOS, PFOA, PFHxS, C9–C14 PFCAs, and related substances) are already strictly restricted under the POPs Regulation and REACH Annex XVII. All distributed products adhere to these limits.
- **Fluoropolymers within Product Portfolio:** Vink Plast distributes and machines high-performance fluoropolymers (including **PTFE, PVDF, FEP, and PFA**). These materials are chemically inert, non-toxic articles; however, they fall under the broad OECD definition of PFAS.
- **Pending Universal REACH Restriction Proposal:** The broad PFAS restriction dossier submitted by authorities in Denmark, Germany, the Netherlands, Norway, and Sweden remains under evaluation by the European Chemicals Agency's (ECHA) scientific committees (RAC and SEAC). We track these committee opinions and transitional arrangements closely to support our customers with compliant supply options and substitution strategies if necessary.

5. RoHS Directive (2011/65/EU as amended by Directive (EU) 2015/863 & Directive (EU) 2019/1846)

Based on technical information provided by our upstream suppliers, we confirm that the 10 restricted substances (commonly referenced under the informal terms RoHS 2 and RoHS 3) are neither intentionally added nor present above the defined maximum concentration values (MCVs) in our semi-finished plastic materials:

1. Cadmium (Cd) (< 0.01% / 100 ppm)
2. Lead (Pb) (< 0.1% / 1,000 ppm)
3. Mercury (Hg) (< 0.1% / 1,000 ppm)
4. Hexavalent Chromium (Cr VI) (< 0.1% / 1,000 ppm)
5. Polybrominated Biphenyls (PBB) (< 0.1% / 1,000 ppm)
6. Polybrominated Diphenyl Ethers (PBDE) (< 0.1% / 1,000 ppm)
7. Bis(2-ethylhexyl) phthalate (DEHP) (< 0.1% / 1,000 ppm)
8. Butyl benzyl phthalate (BBP) (< 0.1% / 1,000 ppm)
9. Dibutyl phthalate (DBP) (< 0.1% / 1,000 ppm)
10. Diisobutyl phthalate (DIBP) (< 0.1% / 1,000 ppm)

6. Disclaimer and Validity

This statement is issued to the best of our current knowledge and relies entirely on technical data sheets and material declarations furnished by our raw material producers. Because Vink Plast does not conduct routine chemical analytical assays on incoming raw materials or finished products, unintended trace contamination from manufacturing equipment or upstream supply chains cannot be completely excluded. This document is reviewed and updated whenever substantial modifications occur in relevant EU legislation (such as updates to ECHA's Candidate List or amendments to the POPs Annexes) or when material formulations change. The current version of this declaration is published and accessible at **www.vink.dk**.

On behalf of Vink Plast:

Sean Quint

Sean Quint
QHSE Manager
Vink Plast

Limitations

Vink Plast considers the above information to be accurate. The information is based on data obtained through ongoing due diligence regarding goods and materials supplied by third-party suppliers. Vink Plast provides this information on an "as is" basis, without warranty of any kind, either express or implied. Vink Plast reserves the right to update and amend this notice whenever deemed necessary or appropriate. You are welcome to request further information.