



Re: REACH Information Request

Dear Valued Customer:

The European Union Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulation potentially affects both individual chemicals (referred to as “substances” under REACH) and finished items comprised of such substances (referred to as “articles” under REACH). Substances are potentially subject to REACH pre-registration and registration requirements while articles with no intentional substance release are not.

ITW Specialty Film has carefully reviewed European Chemicals Agency (ECHA) guidance on articles and consulted with expert legal counsel regarding proper treatment of hot stamp foils and thermal transfer films under REACH. We have determined that our products to include their carrier films fall within the definition of an article since they are both “objects which during production are given a special shape, surface or design which determines their function to a greater degree than does their chemical composition” [REACH Article 3 (3)]. Hot stamp foils and thermal transfer films are transferred in a manner to maintain their entire integrity from the carrier film to another substrate rather than a random release of a substance. As articles with no intentional substance release, our products are not subject to REACH pre-registration and registration requirements. Articles are subject to REACH communication and notification requirements if they contain Substances of Very High Concern (SVHC) in excess of 0.1% by weight. ITW Specialty Film will continue to monitor the ECHA SVHC list to determine if our products are affected. If SVHC are determined to be present in products provided to your company in excess of 0.1% by weight, we will promptly communicate that to you.

ITW Specialty Film values your business and hopes that this information meets your needs. If you require more specific information, please contact me at [insert appropriate phone number]. For your reference, the overall approach of Illinois Tool Works Foils & Thermal Films Group to REACH compliance is detailed in the enclosed document.

Sincerely,

Ho-Jin Jo
QA Manager,
ITW Specialty Film