



## STATEMENT REGARDING EU-REACH

Product Number: EV92R58A

Revision: 1

Product Name: ECC204A CryptoAuth

Date: 12/08/2021

To our valued customers:

The European Union's REACH Directive<sup>1</sup>, among other things, requires EU manufacturers and importers to determine if they must: 1) register certain substances with the European Chemicals Agency ("ECHA"), 2) notify ECHA regarding certain substances, or 3) communicate to customers that certain substances are present in the materials ("articles" and "preparations") they manufacture or import into the European Union.

Microchip's compliance efforts include monitoring REACH regulatory developments and an evaluation process for our products. Our product evaluation includes engineering analysis, third party testing, and other information or documents provided by the manufacturer or distributor of raw materials or by subcontract assemblers of Microchip's electronic products. Because our evaluation includes reliance on third party information, we cannot verify to a certainty the accuracy of such third party information. With that limitation in mind, we can provide the following information to our customers:

1. Registration with ECHA: When assessing REACH requirements for registration, EU manufacturers and EU importers are required to evaluate their articles to determine whether a prescribed exposure to chemicals exists. Registration of substances in articles is required where: a) substances are intended to be released from the produced or imported articles during normal and reasonably foreseeable conditions of use; and b) the total amount of substance present in the articles with intended releases produced and/or imported by that actor exceeds one (1) metric ton or more per year per producer or importer. As of the date above, there are no known or intended releases of chemical substances under normal or reasonably foreseeable conditions from the use of Microchip's electronic products. Therefore, Microchip is not subject to registration requirements under Articles 7(1) and 7(5) of REACH for its electronic products.

2. Notification with ECHA: Separate from the registration requirement above, the REACH Directive requires EU manufacturers and importers of certain substances to notify ECHA regarding each substance that is: a) a Substance of Very High Concern ("SVHC")<sup>2</sup>, present above a concentration threshold of 0.1% of the weight of the article; and b) imported in quantities of one (1) metric ton or more per year. Exemptions and other conditions can play into

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<sup>1</sup> Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC <http://echa.europa.eu/web/guest/regulations/reach>

<sup>2</sup> Link to the published REACH SVHC list: <http://echa.europa.eu/candidate-list-table>



the analysis. Microchip does not import more than one metric ton of any of the 211 SVHC into the European Union in any given year. Therefore, the notification requirements under Article 7(2) of REACH are not applicable to Microchip's electronic products.

3. Communication to Customers: REACH also imposes communication requirements on EU manufactures and importers to their customers regarding the existence of SVHC, if present above a concentration threshold of 0.1% of the weight of the preparation or article. As of the date above, none of the articles in Microchip's development tool listed above have been found to have equal to or greater than 0.1% weight over weight of any of the 211 SVHC. This letter is intended to be a proactive notification of the existence of REACH SVHCs and Microchip's efforts to substitute said materials.

4. Communication with respect to ANNEX 17: Annex XVII sets out a list of restrictions on the manufacture, placing on the market and use of certain dangerous chemical substances, mixtures, and articles. The Annex contains restrictions on the marketing and use of dangerous substances adopted since 1976 in the framework of Directive 76/769/EEC, as well as subsequent restrictions adopted under REACH. These substances have specific restrictions and certain chemical restrictions in specific product(s). To the best of our current knowledge and belief, Microchip products have no restrictions and meet the requirements listed under Annex XVII.

Microchip commits to compliance with the REACH Directive and to communicate compliance to our customers as the scope and breadth of REACH regulation evolves.

For information regarding the exclusive, limited warranties applicable to Microchip products, please see Microchip's standard terms and conditions of sale, which are printed on our sales documentation and available at [www.microchip.com](http://www.microchip.com).

*Hunter Whitlow*

Hunter Whitlow

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## **Attachment "A"**

Microchip does not specifically analyze (crush & grind) finished products for the presence of any SVHC. Information is believed to be accurate based upon review of material composition and information obtained directly from our various supply chains.

REACH definition at § 7.1(b) requires registration of an article only if it contains a regulated substance that is intended to be released under normal or reasonably foreseeable conditions of use. In all cases, each of these substances identified above are chemically bound within the ceramic or glass matrix and presents no hazard to humans or the environment under normal handling and use.

*Diboron trioxide* ( $B_2O_3$ ) along with silicon dioxide ( $SiO_2$ ), is an intermediate "network former" substance in the production of borosilicate glass. The final product (borosilicate glass) is itself a new substance, synthesized from the raw materials but no longer containing them in their original independent states. Therefore, as *Diboron trioxide* ( $B_2O_3$ ) is not present in the glass in its molecular form or cannot be released under normal or reasonably foreseeable conditions manufacturers/importers are not obliged to communicate information on the substances mentioned above according to Article 33(1) and in accordance with Article 7(2) ff. of the REACH regulation.

Lead oxides ( $PbO$ ,  $Pb_3O_4$ ) noted as constituents of ceramics as such, the chemical characteristics, including risk to the environment and humans, of lead oxides ( $PbO$ ,  $Pb_3O_4$ ) as constituents of ceramics are not comparable with the properties of the final ceramics matrix. The chemical compound created is not a Substance of Very High Concern (SVHC). Manufacturers/importers are not obliged to communicate information on the substances mentioned above according to Article 33(1) and in accordance with Article 7(2) ff. of the REACH regulation.

Reference: [Joint Position of BVKI, JEITA and ZVEI](#)