

Declaration of Conformity	FDK
Date: November 22, 2017	FDK CORPORATION

Dear Madam, dear Sirs,

Statement to REACH conformity

Products: All batteries including packaging delivered from FDK

Thank you for your inquiry about relationship between REACH regulation and our batteries.

FDK Corp and its affiliated companies have interpreted REACH regulation accurately and implemented it in right manner from its incoming into force in 1 June 2007. We are fully aware of our legal obligation. Our approach is to have a detailed knowledge of our products composition by periodical investigation so as to ensure their compliance with legal requirements.

Interpretation of relationship between REACH regulation and batteries is bit complicated but very simple in nature as showing below, so I would like to state mainly two points; 1) The position of batteries on the basis of REACH regulation, 2) Our obligation related to REACH regulation.

1. The position of batteries on the basis of REACH regulation

We shall state that we don't have any obligations to register our batteries to the agency.

The reason why above statement can be announced is based on the interpretation of REACH regulation; especially clause 7(1) and 7(5), and certain part in "Guidance on requirements for substances in articles ver.3" which was published on December 2015 from ECHA. These texts say batteries are categorized as article. Though "substances" are used in battery as internal components, we have no obligation to register them because our batteries are not manufactured in EU territory.

Article 7(1) and 7(5) of REACH regulation states that any producer or importer of articles shall submit a registration to the agency for any substance contained in those article, if both the following conditions are met;

- a) The substance is intended to be released under normal or reasonably foreseeable conditions of use, and
- b) The substance is present in those articles in quantities totaling over one tone per producer or importer per year.

Battery is not such article that intends to release any substance outside but intend to supply electricity generated by internal chemical reaction of negative and positive electrode. The condition

a) is not met, so we have no obligation to submit registration to agency. Hence we cannot respond if you may request us for submitting document like certificate or agreement of batteries to be registered batteries to the agency, resulted in compliance with REACH regulation. We appreciate your understanding.

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2. Compliance with restriction on the manufacturing, placing on the market and use of certain dangerous substances (Article 67 and Annex XVII REACH)
A substance on its own, in a preparation or in an article, for which Annex XVII contains a restriction shall not be manufactured, placed on the market or used unless it complies with the conditions of that restriction. The list of restrictions can be accessed on below URL;

<https://echa.europa.eu/substances-restricted-under-reach>

We declare complying with restriction on the manufacturing (limited to simple assembling of batteries in Europe), placing on the EU market and use of substances listed in Annex XVII REACH.

3. Compliance with the duty to communication on substances in articles (Article 33, REACH)
Article 33 (1) of REACH regulation mandates any supplier of an article containing a substance listed in SVHC candidate list in a concentration above 0.1% weight by weight (w/w) shall provide the recipient of the article information, available to the supplier, so allow safe use of article including, as a minimum, the name of that substance. The substances listed in SVHC candidate list can be accessed on below URL;

<https://echa.europa.eu/candidate-list-table>

Article 33 (2) of REACH regulation mandates any supplier of an article containing a substance listed in SVHC candidate list in a concentration above 0.1% weight by weight (w/w) shall provide the consumer within 45 days from the request, with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of the substances.

Having regard to importance of this, we are always monitoring relevant information like News release from ECHA and taking action of confirmation whether or not new announced SVHC candidate substances are involved in our components of batteries as well as packaging. Our action; for example, delivering query to and collection from suppliers may take a long time, so we appreciate your understanding if we delay to answer.

As of this moment, we notify that our product indicated at the top of this document does not contain any SVHC candidates nominated 174 substances by ECHA on July 10, 2017 except for certain products listed in Annex A. For more detailed information about inclusion of SVHC in individual product, please contact our sales representatives.

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Environment Chief, FDK CORPORATION

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ANNEX A

Our batteries (except those mentioned in the table below) do not contain any substances above 0.1 mass-% per product that are listed on the “candidate list”, as updated on 07 July 2017.

Table 1

System	SVHC	CAS#
Primary lithium cylindrical batteries (High capacity type)	1,2-dimethoxyethane https://echa.europa.eu/substance-information/-/substance-information/100.003.451	110-71-4
Primary lithium coin batteries	https://echa.europa.eu/substance-information/-/substance-information/100.003.451	