

Marshall-Tufflex Ltd REACH Statement

Marshall-Tufflex Ltd complies with the requirements of the REACH Regulation (EC) No 1907/2006. Under Article 33 we have a duty to communicate information on substances in articles greater than 0.1% by weight, should these substances be present in our products.

In line with government targets and PVC industry led initiatives the use of recycled material is encouraged and most converters seek out suitable supplies of recycled material to meet the government targets, support the industry initiative and offer value to customers. Defra comment that "there are very substantial environmental benefits in terms of carbon impact from using recycled as compared to virgin PVC."

The recycled materials derive from either process scrap from a pre-consumer activity or from post-consumer recovered material, particularly replaced PVC windows. There is a possibility that these recyclates may include lead salts, specifically fatty acids, C16-18 lead salts. However, Defra comment that "this duty is intended to be much lighter than the duty on substance suppliers because it is recognised that Substances of Very High Concern within articles generally present a much lower risk."

Lead based stabilisers used within PVC formulations are immobilized in the plastic matrix in much the same way as they are within traditional glass products made from lead crystal and lead compounds will not be released during the service life of the articles.

An official Swedish test institute conducted tests to see how lead migration from PVC pipe would compare to the limits set down in the EU Ceramics Directive (which covers migration limits for food contact ceramics). Their results showed that it is just as safe to eat meals off a lead stabilised PVC pipe as it is to eat them off a ceramic plate.

Additional information can be found within the sustainability section of www.pvc.org/en.



Paul Mitchell
Operations Director

On behalf of the Chief Executive Officer, Marshall-Tufflex Ltd.