



March 28, 2024

Kinematics LLC
21410 N. 15th Ln, Suite 104
Phoenix, AZ 85027

Project #: F2P31544B
Report #: F2P31544B-02RC - REACH Final Report

Dear Shane Kemplin:

The purpose of this Final Report is to provide you with the final status of the REACH compliance of your product, Slewing Drives - HE and ST Series.

1. REACH Requirements

Article 33 of EU REACH Regulation No. 1907/2006 requires that suppliers inform recipients if an article contains a substance listed in the [Candidate List of Substances of Very High Concern \(SVHC\)](#) that is present above 0.1% w/w (weight by weight). Article 3(3) of the REACH regulation defines an article as “an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.”

The Substances of Concern in Products (SCIP) database was established under the Waste Framework Directive (WFD). The WFD requires SVHC information for parts/subassemblies with SVHC content above 0.1% w/w to be entered into the European Chemicals Agency (ECHA)-SCIP database.

The EU REACH regulation is updated every 6 months to include additional SVHC substances. In addition, there is a 6-month transition period associated with each update to give manufacturers and suppliers time to comply.

On January 23, 2024, ECHA updated the [Candidate List of Substances of Very High Concern \(SVHC\)](#) to include an additional five substances, for a total of 240 substances subject to REACH evaluation. After the 6-month transition period, F2 Labs will evaluate against REACH 240 (30th REACH). Until then, our reports will reflect compliance with REACH 235 (29th REACH).

2. Steps Performed to Determine REACH Compliance

- Step 1 - We receive your BOM at the start of this project.
- Step 2 - Your BOM is formatted, reviewed at a high level, and updated to close necessary gaps. F2 Labs performs only spot checks on the accuracy of the content (e.g., correct part number for supplier or manufacturer). The BOM is then loaded into our database system.
- Step 3 - An email campaign is launched to your suppliers and/or manufacturers detailing specific instructions for providing the missing information. The campaign generally lasts three weeks. During this campaign, F2 Labs also performs its own search for information.
- Step 4 - All submitted data are compiled and reviewed. Parts with missing information are researched further by F2 Labs. When possible, another round of outreach to the suppliers and/or manufacturers is performed to resolve the issue.
- Step 5 - A discrepancy report is prepared to indicate the REACH compliance of your product, part by part. The client is given typically 30 days to respond.

- Step 6 - F2 Labs reviews your response to the discrepancy report and updates the database. F2 Labs will then perform another round of research on the outstanding parts. As needed, F2 Labs may seek your assistance with problematic suppliers and/or manufacturers. This will be the last round of evaluation of your project under the current agreement for your project.
- Step 7 - A final report is prepared to indicate the final REACH/WFD compliance of your product, part by part. If applicable, an I6Z data file for uploading to the ECHA-SCIP database will be included with the report. **THIS IS THE STEP WE ARE AT NOW.**

3. Summary of REACH Findings

With this report, F2 Labs has provided an Excel spreadsheet of the REACH compliance of your product, part by part. The table below summarizes the overall findings in that Excel spreadsheet.

Count (%)	Category	Category Definition
45 of 46 (98%)	Compliant	This indicates that the subject part/subassembly has adequate documentation to determine that it is compliant, with no SVHC content above 0.1%.
1 of 46 (2%)	Compliant with SVHC Content	This indicates that the subject part/subassembly has adequate documentation to determine that it is compliant, with SVHC content above 0.1%. Lead is the most common reason for this determination.
0 of 46 (2%)	Not Submitted	This indicates that the subject part/subassembly has inadequate information to make a compliance determination.

4. Summary of SCIP Information

The second tab of the Excel spreadsheet includes SCIP information for any part/subassembly that has SVHC content greater than 0.1%. This information is packaged and ready for upload in the I6Z data file. Note that, although you cannot open an I6Z data file on your computer unless you have the appropriate software, the contents of this file were taken from the SCIP Submission Data tab of the Excel file. The I6Z data file is to be sent to the entity who uploads the data to the ECHA-SCIP database (i.e., your company if you have an office in the EU, or your first importer if you do not).

5. Final Points

Because this is the final report, there will be no additional rounds of review for new REACH information under the given contract. This report is your final deliverable for REACH work under Project # F2P31544B according to your contract.

If you believe the report requires revision or are seeking clarification, please contact F2 Labs at rohs@f2labs.com within 10 business days.

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Reviewed by:


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Attachments: F2P31544B-02EU - Final Report Excel
74231ce5-9ba5-4f7f-aeb0-0e32056140b0 I6Z data file