



REACH SVHC DECLARATION

CZL Tilburg BV

Issue Date: July 2026

1. Purpose of this Declaration

CZL Tilburg BV is committed to complying with Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). We support the objective of protecting human health and the environment through responsible chemical management and continuous compliance with applicable legislation.

2. REACH SVHC Compliance Statement

Based on information provided by our suppliers and our knowledge of the processes applied within CZL Tilburg BV, we confirm that the surface treatment layers applied by CZL Tilburg BV do not contain Substances of Very High Concern (SVHCs) above the reporting threshold of 0.1% (w/w) as defined under Article 33 of the REACH Regulation.

Certain chemicals used in our production processes may appear on the ECHA Candidate List of SVHCs. However, these substances are not present in the deposited surface treatment layers above the applicable threshold values. Therefore, the applied layers are considered compliant with the relevant REACH requirements relating to SVHCs.

Information regarding substances used in our process baths is obtained from Safety Data Sheets (SDS/MSDS) supplied by our chemical suppliers. These documents provide information on hazards, exposure scenarios and risk management measures to ensure responsible use of chemicals for both employees and the environment.

3. Chromium Trioxide Authorisation Status

Chromium trioxide is classified as a Substance of Very High Concern (SVHC) and is subject to authorisation under the REACH Regulation.

CZL Tilburg BV performs hard chrome plating activities in compliance with the applicable REACH authorisation requirements, including Authorisation Number REACH/20/18/13. We continue to fulfil all obligations associated with this authorisation and closely monitor technological and regulatory developments concerning potential alternatives to chromium trioxide.

Regulatory Update – July 2026

The European Union is currently evaluating a restriction proposal for Hexavalent Chromium (Cr(VI)) substances, including chromium trioxide and chromic acid. This restriction is intended to replace the current authorisation approach with a harmonised restriction framework.



June – August 2026: The draft opinion of the Socio-Economic Analysis Committee (SEAC) was subject to a public consultation running until 17 August 2026. Following completion of the consultation process, SEAC will prepare its final opinion. The European Commission is expected to adopt a final decision by mid-2027.

CZL Tilburg BV continues to monitor these developments closely and will maintain compliance with all applicable legal requirements pending further regulatory decisions.

4. PFAS restriction

The EU REACH PFAS restriction proposes a near-total ban on over 10,000 per- and polyfluoroalkyl "forever chemicals". Currently in its evaluation phase, the European Chemicals Agency (ECHA) expects the final regulatory decision between 2027 and 2028, with the ban entering into force in 2029.

This concerns the use of a mist suppressor in the process bath for hard chrome plating to prevent emissions and exposure of Cr(VI) to humans and the environment. The product contains a low concentration of PFAS and is present in low concentrations in the process baths. Our supplier has submitted a request for essential use for the process chrome plating by ECHA for this component.

At the hard chrome plating process, the product used as mist suppressor during processing had no replacement that was yet proven safety and liability in use. We continuously make efforts to search and explore new possible replacement for the product in our use and started to scale up a potential replacement that is liable and safe to support the gradual phase-out of PFAS.

PFAS is not present in any of the surface treatment layers applied on the products.

5. Limitations of this Declaration

This declaration is subject to the following limitations:

- The information contained herein is based on information and declarations provided by our suppliers.
- CZL Tilburg BV does not perform independent third-party chemical analysis to verify supplier declarations.
- This declaration applies exclusively to the surface treatment layer applied by CZL Tilburg BV.
- Compliance of materials and products supplied by customers to CZL Tilburg BV is outside the scope of this declaration.
- Further processing, modification, assembly, use, storage or handling by customers or third parties may affect compliance and is beyond the control and responsibility of CZL Tilburg BV.
- The ECHA Candidate List of SVHCs may be amended periodically and compliance assessments are based on information available at the date of issue of this declaration.



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surface treatments

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For the latest Candidate List of SVHCs, please refer to:

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

6. Conclusion

Based on currently available supplier information and our process knowledge, CZL Tilburg BV considers the applied surface treatment layers to be compliant with the applicable REACH requirements concerning Substances of Very High Concern (SVHCs).

Should you require further information, please do not hesitate to contact us.

Kind regards,

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