

Statement on Compliance with Regulation (EC) No 1907/2006 (REACH)

Registration, Evaluation, Authorisation and Restriction of Chemicals

Document No.	CT-REG-002
Version	1.0
Issue date	4 September 2026
Supersedes	REACH Compliance Statement dated 16 June 2025 (unnumbered)
Scope	All products manufactured and/or placed on the market by Chemical Technologies SIA
Related documents	CT-REG-001 (Absence of Microplastics, CTA Series) · CT-REG-010 (Composition of Raw Materials, CTA Series) · CT-REG-011 (Regulatory Documentation) · CT-REG-022 (Heavy Metals)
Next review	After each update of the Candidate List and at least annually

1. Scope

This Statement covers all products manufactured and/or placed on the market by Chemical Technologies SIA ("ChemTech"): pearlescent pigments (including the CTA Series, 18 grades), aluminium and bronze pigments, fluorescent and luminous pigments, mica flakes, PET glitters, plastic beads and PU powders, in all supplied product forms (Loose Powder, PG Powder, Aqua Powder, DS Powder and SC Grade).

All ChemTech products are substances or mixtures within the meaning of Article 3(1) and 3(2) of REACH. None of them is an article within the meaning of Article 3(3).

2. Regulatory basis

Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) was adopted on 18 December 2006 and entered into force on 1 June 2007, establishing the European Chemicals Agency (ECHA). This Statement refers to REACH as amended and to its consolidated version applicable on the issue date, and in particular to:

- the Candidate List of Substances of Very High Concern (SVHC) for Authorisation, published by ECHA under Article 59(10);
- Annex XIV — the Authorisation List (Title VII, Article 56);
- Annex XVII — Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles (Title VIII, Article 67);
- Annex II — Requirements for the compilation of Safety Data Sheets, as amended by Commission Regulation (EU) 2020/878.

Classification and labelling of ChemTech products follow Regulation (EC) No 1272/2008 (CLP).

3. Registration (Articles 5 and 6)

All substances contained in ChemTech products that are subject to registration are registered with ECHA — by Chemical Technologies SIA in its capacity as importer, by the Only Representative appointed by the non-EU manufacturer under Article 8, or by an EU supplier upstream in our supply chain — or are exempt from registration under Articles 2 and 6 or Annexes IV and V of REACH. Where applicable, registration numbers are stated in Section 1 or Section 3 of the Safety Data Sheet.

4. Candidate List of Substances of Very High Concern (SVHC)

Reference version: the Candidate List as published by ECHA and current on the issue date of this Statement (latest update taken into account: 4 February 2026, 253 entries). The Candidate List is updated by ECHA twice a year, typically in January/February and June/July; ChemTech reviews every update against the composition of its products.

Declaration. To the best of our knowledge, based on our own composition data and on the information provided by our suppliers, none of the substances included in the Candidate List is present in any ChemTech product, in a concentration above 0.1 % weight by weight (w/w) or in accordance with applicable restriction set out in Annex XVII. Consequently, no information obligations under Article 33 (SCIP notification) and no notification obligations under Article 7(2) of REACH arise for ChemTech products.

5. Annex XIV — Authorisation List

Declaration. None of the 59 substances listed in Annex XIV of REACH (as last amended by Commission Regulation (EU) 2022/586) is used in the manufacture of, or is present in, ChemTech products. No authorisation under Title VII of REACH is required for the placing on the market or the use of ChemTech products.

6. Annex XVII — Restrictions

Declaration. ChemTech products comply with the conditions of the restrictions laid down in Annex XVII of REACH, in the version applicable on the issue date. Annex XVII does not prohibit substances as such; it restricts specific uses and sets concentration limits. The entries assessed as relevant to ChemTech products are the following.

Our company confirms that all products comply with the REACH Regulation (EC) No 1907/2006, including the requirements set out in Annex XVII - Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles.

We acknowledge that Annex XVII contains a wide range of substance-specific and use-specific restrictions applicable to various materials, components and product categories. Due to the extensive nature of these restrictions, it is not practical to list each of them individually in this statement.

Nevertheless, we ensure full compliance by:

- monitoring updates to Annex XVII and other relevant REACH provisions,
- assessing substances and materials used in our products against all applicable restrictions,
- working closely with our suppliers to verify conformity throughout the supply chain, and
- implementing internal procedures to prevent the use of restricted substances or uses in our products (incl. laboratory testing).

However, given the specifics of our products, we provide a more precise description below regarding microplastics.

Entry 78 (synthetic polymer microparticles, Commission Regulation (EU) 2023/2055). ChemTech products are assessed in two groups:

- **Inorganic products** — pearlescent pigments (natural- and synthetic-mica based, including all 18 CTA grades), aluminium and bronze pigments, luminous pigments and mica flakes — are inorganic materials that fall outside the definition of synthetic polymer microparticles. For the CTA Series this is confirmed by the signed Statement on the Absence of Microplastics (CT-REG-001).
- **Polymer-based products** — PET glitters, plastic beads, PU powders and resin-based fluorescent pigments — fall within the definition of synthetic polymer microparticles. They are placed on the market exclusively for use at industrial sites (paragraph 4(a) of Entry 78). ChemTech provides the

instructions for use and disposal required by paragraphs 7 and 8 in safety data sheets and fulfils the annual reporting obligation to ECHA under paragraph 11. The compliance of the final product (e.g. a plaster, coating or ink in which the particles are permanently incorporated into a solid matrix, paragraph 5(c)) remains the responsibility of the manufacturer of the final product.

7. SCIP database (Directive 2008/98/EC, Article 9(1)(i))

The obligation to notify the SCIP database of ECHA under the Waste Framework Directive applies to suppliers of articles containing Candidate List substances above 0.1 % (w/w). ChemTech products are substances and mixtures, not articles; in addition, they do not contain Candidate List substances above 0.1 % (w/w). No SCIP notification obligation therefore arises for ChemTech products.

8. Safety Data Sheets

A Safety Data Sheet compiled in accordance with Annex II of REACH, as amended by Regulation (EU) 2020/878, is provided for every product. Section 15 of each SDS states the status of the product with regard to the Candidate List, Annex XIV and Annex XVII. Safety Data Sheets and Technical Data Sheets are available for download on every product page at www.chemtech.global.

9. Monitoring and revision

ChemTech monitors the publications of ECHA and the amendments to REACH published in the Official Journal of the European Union. This Statement is reviewed after each update of the Candidate List and at least once a year; a new version is issued whenever a change affects the declarations made herein. This Statement remains valid until superseded by a later version. Product-specific compliance certificates can be provided on request.

Disclaimer

This Statement is based on our best knowledge at the time of issue, on the composition data of our products and on information received from our suppliers, and on the regulations in force on the issue date. It does not constitute a legally binding warranty. The suitability of a product for a particular application, and the compliance of the final product with the regulations applicable to it, remain the responsibility of the manufacturer of the final product.

Contact

Questions regarding this Statement: info@chemtech.global · +371 67381303.

Rīga, 4 September 2026

Viktor Denezhnikov
Chairman of the Board
Chemical Technologies SIA

Revision history

Version	Date	Change
1.0	4 September 2026	First issue under the CT-REG document system. Replaces the REACH Compliance Statement of 16 June 2025: scope defined; registration status added; Candidate List and Annex XIV references updated; Annex XVII declaration restated as

Version	Date	Change
		compliance with restriction conditions, with Entry 78 assessment; SCIP applicability clarified.