

To Whomsoever It May Concern

Reference: Registration under REACH Regulation – (EC) 1907/2006

In reference to the REACH Regulation (EC) 1907/2006, we, Teledyne Instruments-Analytical Instruments, an operating unit of Teledyne Technologies, submit that the REACH registration requirements as currently written do not apply to our business.

We reached this determination after studying the following documents:

1. Official journal of the European Union covering the Regulation (EC) 1907/2006 of the European Parliament and of the Council of December 18, 2006 corrigendum of December 30, 2006, to this Regulation, and Commission Regulation (EC) No. 987/2008 of October 8, 2008 amending Regulation (EC) No. 1907/2006.
2. European Chemicals Agency (ECHA) document titled “Guidance for identification and naming of substances under REACH (June 2007)”
3. ECHA document titled “Guidance on Registration (May 2008)”
4. Substances covered by the Regulation as published under www.netregs.gov.uk.
5. Frequently asked questions as published by the Health and Safety Executive (HSE) of the Government of the UK (<http://www.hse.gov.uk/reach/faq.htm>).
6. "Substances in articles", as found at http://reach.jrc.it/substances_articles_en.htm.
7. HSE document “When do I have to comply with REACH”.

We gave particular attention to the following sections (provided here with abbreviated titles) of the Regulation (EC) 1907/2006 to guide us through our decision process:

1. Annex IV – Exemptions from the obligations to register in accordance with article 2(7)(a)
2. Annex V – Exemptions from the obligations to register in accordance with article 2(7)(b)
3. Annex VII to X – Information for substances in quantities of 1, 10, 100 and 1,000 tonnes or more per annum
4. Annex XIII – Criteria for identification of PBT and vPvB substances
5. Annex XVII – Restriction on manufacture, market or use of certain substances
6. Appendix 1 – Carcinogens, category 1
7. Appendix 2 – Carcinogens, category 2
8. Appendix 3 – Mutagens, category 1 (this section in the standard is empty)
9. Appendix 4 – Mutagens, category 2
10. Appendix 5 – Toxic to reproduction, category 1 (A catchall phrase under column Substances, Lead compounds with the exception of those specified elsewhere in this Annex, would have applied to us if the weight limitation relief was not given).
11. Appendix 6 – Toxic to reproduction, category 2

In our opinion, the key provision of the Regulation is the requirement to register a substance if one Manufactures or Imports the Substance (or an Article that may release a covered Substance) in levels as specified in the ECHA document “Guidance on Registration”.

We are the manufacturers of process analytical sensors, analyzers and systems, and we do not reach the levels of the burden as prescribed in the REACH Regulation. Hence, we submit that we do not intend pre-registering any Substances that we currently use in the manufacture of our products, and as such, consider that the Regulation as written does not apply to our business.