



## Bonnell Aluminum Product Compliance Declaration

**Effective: February 16, 2023**

This document contains information on whether products manufactured by Bonnell Aluminum are compliant with certain global regulation requirements. This document covers all aluminum extruded products manufactured by Bonnell Aluminum except for products using thermal barriers, vinyl, Tredsafe inserts (see Futura Transitions by Bonnell Aluminum), accessories including but not limited to LED light kits, hardware, fasteners, and panel accessories (see TSLOTS by Bonnell Aluminum).

Bonnell Aluminum does not directly place its products on the European Union (EU) market and is therefore not subject to EU legislation. REACH<sup>i</sup>, CLP<sup>ii</sup>, RoHS<sup>iii</sup> and/or BPR<sup>iv</sup> only apply to products imported into the EU and place obligations on EU importers and/or non-EU manufacturers who export such products to the EU. Bonnell Aluminum's products are considered "articles" within the scope of REACH and CLP. RoHS applies to electric and electronic equipment (EEE). BPR applies to biocidal products and/or treated articles.

**The Customer should independently assess any requirements it might have under REACH, CLP, RoHS, and/or BPR when supplying products supplied by Bonnell Aluminum to the EU, including products containing Bonnell Aluminum's products as parts or components.**

On January 17, 2023, nine hazardous chemicals were added to the EU Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) Candidate List of substances of very high concerns (SVHC). REACH now contains a list of 233 chemicals that can be harmful to people or the environment.

Aluminum billets used in the manufacturing of aluminum extrusions are produced from elements extracted from the Earth's crust and recycled aluminum and may contain minute traces of impurities such as lead, cadmium, and mercury, assumed to be below the threshold levels for **REACH** and **RoHS**. None of these impurities are intentionally added as they are considered contaminants to our process.

As of this writing, Bonnell Aluminum confirms that its products may contain substances of very high concern (SVHC) as identified under REACH and CLP and/or substances restricted by the RoHS Directive. These products may contain the following SVHC, assumed below their thresholds: lead, cadmium, chromium, and mercury. For lead, mercury, and hexavalent chromium the maximum concentration is 0.1% by weight in all homogeneous materials in the EEE. For cadmium, the corresponding maximum concentration is 0.01% by weight in all homogeneous materials in the EEE.

In addition, the Customer may specify the product be finished (painted) by Bonnell Aluminum with coatings that may contain any of the following SVHC, below their respective thresholds (<0.1% w/w) based on paint concentrations and coating thickness: strontium chromate, chromium trioxide, lead, lead chromate, carbon black, cadmium sulfide, or pigment yellow 34 (CrO<sub>3</sub>Pb<sub>2</sub>S).

Bonnell Aluminum products **do not contain** substances restricted by **BPR**.

Bonnell Aluminum is also committed to compliance with specific State requirements within the United States. **California Proposition 65<sup>v</sup>** does not have threshold limits and aluminum alloys typically contain lead, cadmium, and mercury at de minimus concentrations. While none of these elements listed on California Proposition 65 are intentionally added to the product, there may be trace amounts that are expected to be at de minimus concentrations. Paints and coatings as specified by the Customer and applied by Bonnell Aluminum to the product



may include any of these additional chemicals listed under California Proposition 65: cumene, carbon black, pigment black 6, cobalt titanite green spinel, nickel oxide, titanium dioxide, or talc.

Exposure to any of these elements that may be present could occur during fabrication (cutting, drilling, grinding) of Bonnell Aluminum's product. **Customer products containing products supplied by Bonnell Aluminum should include a California Proposition 65 label.**

Additionally, Bonnell Aluminum's products **do not contain** any **asbestos**. Raw materials used in the production of Bonnell Aluminum's products do not contain any asbestos nor have the products come into contact with any asbestos during manufacturing, packing or shipping.

Bonnell Aluminum's products **do not include** any Perfluorooctanesulfonic acid (**PFOS**), Per- and polyfluoroalkyl substances (**PFAS**), or perfluorooctanoic acid (**PFOA**) containing materials.

Bonnell Aluminum will update this document annually in accordance with the regulations in effect at the date of publication. The Customer agrees to pay all costs and expenses relative to requests for updated documentation beyond the scheduled annual update and publication or requests to provide evidence of compliance.

*Carl Czarnik*  
Carl Czarnik, Vice President of Operations  
Bonnell Aluminum, Inc.

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<sup>i</sup> EU REACH 1907/2006: The Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation requires the identification of Substances of Very High Concern (SVHC) contained in substances and mixtures above the threshold 0.1% weight by weight manufactured and marketed in the EU. This declaration is inclusive of the **SVHC Candidate List, effective January 17, 2023**.

<sup>ii</sup> Regulation (EC) No 1272/2008 on the Classification, Labeling and Packaging of substances and mixtures (CLP): CLP introduces the United Nations globally harmonized system (UN GHS) for classification and labeling of chemicals into Europe. CLP entered into force on 20th January 2009. The CLP Regulation, Article 46, on Enforcement and Reporting, states that all necessary measures, including maintaining a system of official controls, to ensure that substances and mixtures are not placed on the market, unless they have been classified, labelled, notified, and packaged in accordance with this Regulation.

<sup>iii</sup> RoHS 2 Directive 2017/2102/EU (Amending Directive 2011/65/EU): The Restriction of Hazardous Substances (RoHS) Directive restricts the use of specific substances above an identified threshold, without applicable exemption, for products placed on the market in EU member states. Commission delegated Directive 2015/863 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances referred to in Article 4(1), **effective July 22, 2019**. The RoHS Directive currently restricts the use of ten substances: lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP) and diisobutyl phthalate (DIBP). The maximum concentration values referred in Article 4(2) are listed in Annex II to RoHS 2.

<sup>iv</sup> Biocidal Properties Regulations (BPR) EC (528/2012) and EU (1062/2014): BPR requires the identification of Active Substances (as such term is defined in the Regulations) used in Biocidal products to be (i) registered and (ii) approved for use (from a list of approved active substances and suppliers). Biocidal products are substances or mixtures that contain Active Substances applied to articles with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by chemical or biological means.

<sup>v</sup> California Proposition 65 (Cal. Code Regs. Tit. 27 § 27001): requires the labeling of products containing any of the chemicals known to cause cancer, birth defects or other reproductive harm (Legal Reference Safe Drinking Water and Toxic Enforcement Act of 1986). Exposure levels and discharges to drinking water sources that are below the safe harbor levels are exempt from the requirements of Proposition 65. The current California Proposition 65 list is dated **January 27, 2023**.