

Phoenix Glass, LLC

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615 Alvine Road
Pittsgrove, NJ 08318
(856) 692-0100
(856) 696-5155 (fax)



Phoenix Glass Technical Note

European REACH Compliance Declaration: The European Chemicals Legislation

The Legislation is concerned with the Registration, Evaluation, Authorization, and Restriction of Chemical Substances.

This regulation applies to manufacture within the EU or to those who import into the EU. Companies that import our products will have duties to fulfill the requests for information about the substances in the glass vials and decoration. The glass vials will be considered as articles and will not be pre-registered before importation.

None of our products contain any "substances of intended release". Typically, our products do not release any substances into the environment. As far as we know, all of the substances that are components and raw materials used in our processes have been registered for our uses by suppliers in our supply chain. We acknowledge our responsibility as a manufacturer in the supply chain to provide information on the composition of articles we supply to our customers (Article 33), including confirming the absence or presence of any SVHC (Substance of Very High Concern) when they are present in amounts in excess of 0.1% weight by weight. At present, none of the items we supply contain any SVHC per the latest candidate list in concentrations above .1% weight by weight utilizing the mass balance method. REACH does not require a full content disclosure and preserves the producer's rights to trade secrets. It is our intention to comply with the spirit of the REACH directive as well as the letter of the law.

Phoenix Glass is a manufacturer and decorator of Glass Vials converted through tubing that is supplied. Phoenix will provide technical information obtained from our suppliers including Material Safety Data Sheets and names of substances in our products to our customers upon request.

CONEG: Product Declaration

Phoenix Glass is in compliance in all respects to the packaging requirements for heavy metals as put forth by legislation developed by the Coalition of Northeast Governors (CONEG): namely, (1) no lead, cadmium, mercury, or hexavalent chromium may be intentionally added in our product; and (2) the sum of the incidental (non-intentionally added) concentrations of these heavy metals in our product shall not exceed 100 parts per million by weight.

Furthermore, based upon our knowledge of the manufacturing process and information provided by our raw material suppliers, we would not expect these substances to be present in our final product. Analysis for these chemicals is not routinely performed on these products.

For more information, please contact Lisa Shelton, QA Manager sheltonl@pxglass.com