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To whom it may concern

<i>Unsere Zeichen</i> <i>Our Reference</i>	<i>Durchwahl</i> <i>Extension</i>	<i>Telefax</i> <i>Fax</i>	<i>Datum</i> <i>Date</i>
RF/LB	-541		01.10.2018

REACH & RoHS Regulations

Dear Ladies and Gentlemen,

NGK Spark Plug Europe GmbH is selling spark plugs, glow plugs, sensors, MAF/MAP-sensors, ignition-coils, cables and caps.

The products are produced in the EU, in Asia, in United States of America as well as at the production sites of our mother company in Japan and we are importing them as **ARTICLES**. No **SUBSTANCES** are imported or produced.

Due to this fact, we have the following obligations as an IMPORTER:

- 1. NGK Spark Plug Europe GmbH is not obliged to do any pre-registration.**
- 2. Our articles do not include substances and preparations, which intend to be released from the article under normal or foreseeable conditions of use during their lifetime.**

Furthermore:

1. For our assembly, resp. production sites in Europe, we will pre-register all imported semi-finished products that we are producing, in so far that they are subject to REACH & RoHS conditions.
2. We will ask our European sub-suppliers to comply/fulfil REACH & RoHS obligations.
3. Concerning hazardous substances (Candidate List of June 2018 for 191 so-called SVHC = Substances of Very High Concern) an authorisation will be necessary, if :
 - articles contain more than 0.1 mass % of a substance
 - more than 1 ton per year import volume exists

This list will be carefully checked and an authorisation process will be initiated, should our articles be subject to this regulation.

In our own interests and in order to guarantee high product safety, we will closely follow-up the implementation of REACH & RoHS regulations and as a consequent, all necessary requirements.

With best regards
NGK SPARK PLUG EUROPE GMBH


R. Fukuzawa
REACH Coordinator


L. Birkenbeul
QEHS-Representative