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Restricted Substances Declaration Instructions, Tips and Glossary of Lists

Instructions:

1. Review the Restricted Substances List
2. Add exceptions to the table for REACH SVHC List, REACH Authorisation List, REACH Restricted List, RoHS List, POP List, Proposition 65 List, Montreal Protocol List, Radioactive Substances, and PFAS.
3. Sign the Restricted Substances Declaration
4. Email signed Restricted Substances Declaration to: compliance@wahlclipper.com

Tips:

Wahl products are usually made from a very short list of substances. Regulatory Compliance risks usually occur in these areas:

Item at Risk	Substance	Risk	Strategy
Circuit boards	Lead	RoHS, REACH, Prop65	Specify RoHS compliant solder
PVC coatings and insulation	Lead & DEHP	RoHS, REACH, Prop65	Limit PVC use
Soft-touch plastics	DEHP	RoHS, REACH, Prop65	Specify DEHP-free coatings
Cords	Lead, DEHP	RoHS, REACH, Prop65	Specify compliance for subassembly
Plating	Chromium, Nickel	RoHS, Prop65	Substitute plating materials, use trivalent chrome plating, etc.
Nylon pouches or capes	PFAS	PFAS exposure, Prop65	Specify PFOS/PFOA free coating
Gaskets	PVC/DEHP	RoHS, Reach, Prop65	Substitute material, such as TPU
Shaver foils	Nickel	Prop65	Substitute material, provide Prop65 warning



Restricted Substances Glossary of Lists

REACH

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals. It entered into force on 1 June 2007.

REACH is a regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. It also promotes alternative methods for the hazard assessment of substances to reduce the number of tests on animals.

Article 33 requires communication of information about materials used in articles and/or packaging if ingredients with a content in excess of 0.1%(w/w) that have been classified as particularly alarming by the European Chemicals Agency (ECHA).

REACH is comprised of three lists:

REACH SVHC List

SVHC, Substances of Very High Concern. This is the ECHA candidate list. Substances on this list in amounts greater than 0.1% w/w (1000 ppm) must be identified.

REACH Annex XIV (Authorisation List)

Authorisation is one of the REACH processes for managing the risks of hazardous substances. It aims to ensure that risks from substances of very high concern (SVHCs) are properly controlled and that these substances are progressively replaced by suitable alternatives, without introducing unwanted disruptions to the functioning of the internal market. This list identifies substances that have specific uses and allowances.

REACH Annex XVII (Restricted List)

The substances on this list are restricted for use by ECHA.

RoHS List

RoHS stands for Restriction of Hazardous Substances and impacts electronics and many electrical products as well. The original RoHS, also known as Directive 2002/95/EC, originated in the European Union in 2002 and restricts the use of six hazardous materials found in electrical and electronic products. All applicable products in the EU market since July 1, 2006 must pass RoHS compliance.

Directive 2011/65/EU was published in 2011 by the EU, which is known as RoHS-Recast or RoHS 2. RoHS 2 includes a CE-marking directive, with RoHS compliance now being required for CE marking of products. RoHS 2 also added Categories 8 and 9 and has additional compliance recordkeeping requirements. Directive 2015/863 (July 22, 2019) is known as RoHS 3. RoHS 3 adds four additional restricted substances (phthalates) to the list of six.

POP List

Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment. They can be transported by air, water, or migratory species across international borders, reaching regions where they have never been produced or used. International risk management is necessary as no region can manage the risks posed by these substances alone.



Proposition 65

The official name of Proposition 65 is the Safe Drinking Water and Toxic Enforcement Act of 1986. Proposition 65 requires businesses to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment. By requiring that this information be provided, Proposition 65 enables Californians to make informed decisions about their exposure to these chemicals.

Proposition 65 requires California to publish a list of chemicals known to cause cancer, birth defects or other reproductive harm. This list, which must be updated at least once a year, has grown to include approximately 900 chemicals since it was first published in 1987.

Montreal Protocol List

The Montreal Protocol, finalized in 1987, is a global agreement to protect the stratospheric ozone layer by phasing out the production and consumption of ozone-depleting substances (ODS).

Radioactive Substances

Radionuclides (or radioactive materials) are a class of chemicals where the nucleus of the atom is unstable. They achieve stability through changes in the nucleus (spontaneous fission, emission of alpha particles, or conversion of neutrons to protons or the reverse). This process is called radioactive decay or transformation, and often is followed by the release of ionizing radiation (beta particles, neutrons, or gamma rays).

PFAS Content

Per- and polyfluoroalkyl substances (PFAS) are a group of over 4,700 human-made substances that are used as surfactants, lubricants, repellents (for dirt, water, and grease). They can be found in certain firefighting foams, textiles (including carpets, furniture, and clothing), cosmetics, and in food packaging materials.

Adverse environmental and health effects have been observed for well-studied PFAS (PFOS, PFOA, and LC-PFCAs and their salts and precursors) and they have been shown to pose a risk to the Canadian environment. In Canada, PFOS, PFOA, and LC-PFCAs (and their salts and precursors) are prohibited through regulations; however, scientific evidence to date indicates the PFAS used to replace regulated PFOS, PFOA, and LC-PFCAs may also be associated with environmental and/or human health effects.