



REACH

Statement on “substances of very high concern” (SVHC) according to the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), published on the 30th December 2006 in the official Journal of the European Union 396/1.

We thank you for your inquiry concerning our information obligations for “candidate list of substances of very high concern for authorisation” (so called “SVHC”) in our articles according to Art. 33 of the REACH-Regulation (EC) No 1907/2006. REACH provides our company in the role of a “downstream user” and a supplier of an article” with several obligations on giving and disseminating product information along the supply chain. Unfortunately, it is unclear to many companies what these information obligations concretely imply. This often leads to situations where different companies along the supply chain request one another to certify the “REACH-conformity” or to give full substance analysis of their products and to fill in apparently adequate documents. These kinds of statements are not intended by the REACH- regulation though and are also not helpful in complying with the mandatory communication and information obligations. In the end they are just causing a large amount of time and effort for most companies without resulting in legal certainty or any other benefit for the involved parties.

Therefore, we would like to let you know in detail what kind of information as a “supplier of an article” will provide to you according to the REACH-regulation.

The Contents are as follows:

- Cadmium
 - Less than .0005%(5ppm) by weight
- Hexavalent Chromium
 - Chromium in hexavalent form is not present in our products
- Mercury
 - Less than 00005% (.05ppm) by weight
- Lead
 - In steels with no specific addition, the lead content will not exceed .03% by weight
 - In steels where lead is added to give an improvement in machine-ability, the lead content is given in the lead certified cast analysis and never exceeds 0.35% by weight.
 - The ELVD ANNEX 11 provides for ‘steel’ (including galvanized) containing upto 0.35% lead by weight.