

REACH CERTIFICATE OF COMPLIANCE

Statement on: Information requirements for suppliers of articles according to 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 30 December 2006 in the Official Journal of the European Union 396/1.

Dear Sir or Madam,

thank you for your request regarding our information requirements for „Substances of Very High Concern“ („SVHC“; Candidate List of Substances of Very High Concern for authorisation) in our articles according to Article 33 of the REACH-Regulation (EC) No 1907/2006 (REACH). As „downstream user“ and as „supplier of an article“ under REACH we are forced to pass on information along the supply chain. Unfortunately it is unclear to many companies what these information requirements actually mean. This often results in situations where companies along the supply chain urge each other to confirm „REACH compliance“ of articles. Such statements are not intended by REACH. For companies they only cause additional expenses, but generate neither legal certainty nor other real benefit. Therefore we would like to inform you what information you will receive from us as „supplier of an article“ in accordance with the requirements of REACH.

Information requirements according to Article 33

According to Article 33(1) REACH, any supplier of an article⁴ containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

If such cases occur we will properly comply with the information requirements in order to ensure the safe handling of our high quality articles. We are in close contact with our suppliers and have never received any information on SVHC in articles. On the basis of our risk assessment there are no indications which will lead to a specific sample analysis up to now. According to the information available we currently assume that our articles do not contain any SVHC in a concentration above 0,1 % weight by weight (w/w). Once we have further information we will inform you immediately and coordinate appropriate measures. Due to our broad range of articles and due to the fact that we are depending on the information coming from our suppliers, who also have to fulfil the information requirements, you will certainly understand that we are not able to give further legally binding statements.

REACH implementation in our company

The expert group „Environment and occupational safety“ of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. – we are involved in the expert group via our industry association [Deutscher Schraubenverband] – regularly informs us about proposed substances for the Candidate List, public consultations, new SVHC on the Candidate List⁵ and about the relevance of SVHC. The published information on uses of SVHC show that the products supplied do not contain any of these substances⁶.

By sending you this information letter to fulfil our information requirements as a „supplier of an article“ according to Article 33(1) REACH we are following legal provisions, recommendations of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. and our industry association [Deutscher Schraubenverband].

This statement applies only to the article / articles supplied by us. Modifications of the article / articles within the processing are thereby not covered.

If you have further questions concerning REACH or the new European Chemicals Policy in our company please do not hesitate to contact us

⁴ Art. 3 no. 3 REACH: article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition

⁵ <http://echa.europa.eu/candidate-list-table> and <http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste.html>

⁶ <http://echa.europa.eu/web/guest/information-on-chemicals/candidate-list-substances-in-articles-table>