

**“...EC No. 1907/2006
et seq. (REACH)...”**

Declaration concerning the duty for suppliers of products to communicate information in accordance with Art. 33 of Regulation (EG) No. 1907/2006 of the European Parliament and the Council of December 18, 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) published on December 30, 2006 in the Official Journal of the European Union 396/1.

The REACH Regulation stipulates that our company is “obligated” to pass information along the supply chain in the role of “downstream user” and as the “supplier of a product”.

Unfortunately, many of those affected are often unsure what the term “duty to communicate information” actually means. This often results in companies along the delivery chain each asking the other to provide confirmation of the “REACH conformity” of products.

However, such declarations are not stipulated in the REACH Regulation. All they do is cause considerable extra work for the companies; they do not generate legal certainty or any real benefit for those involved.

Therefore, we would like to tell you what information you will receive from us as a “supplier of a product” according to the provisions of the REACH Regulation.

“Duty to communicate information” according to Art. 33 of the REACH Regulation

You procure products from us¹.

¹ Art. 3 No. 3 REACH Regulation: Product: An object which is given a special shape, surface or design during production that determines its function to a greater extent than its chemical composition does.

Art. 33 para. 1 of the REACH Regulation “obligates” the supplier of a product containing a substance on the ECHA candidate list that meets the criteria of Art. 57 and identified in accordance with Art. 59 para. 1 in a concentration of more than 0.1% weight by weight (w/w) to provide the recipient of the product with sufficient information, available to the supplier, to enable safe use of said product, as a minimum, the name of the substance in question.

As the element “**Lead**” (CAS No. 7439-92-1/EC No. 231-100-4) has been included on the Candidate List as an SVHC substance since 6/27/2018, we are required to inform you which products containing the following materials are affected; for example, of the ones that you order from us:

Material group	Material No.:	Old material description
Steel	1.0502	C35Pb
	1.0504	C45Pb
	1.0718	11SMnPb30+C
	1.0737	11SMnPb37+C
	1.0757	45SPb20
Brass	CW602N	CuZn36Pb2
	CW603N	CuZn36Pb3
	CW607N	CuZn38Pb1
	CW608N	CuZn38Pb2
	CW612N	CuZn39Pb2
	CW614N	CuZn39Pb3
Copper	CW113C	CuPb1P
Bronze	CC493K	CuSn7Zn4Pb7-C
Aluminum	EN AW-2007	AlCuMgPb
	EN AW-2011	AlCu6BiPb
	EN AW-6012	AlMgSiPb
	EN AW-6026	AlMgSiMnBiPb

This list makes no claim to be error-free and/or complete and only shows the most frequently ordered materials that are affected.

We would also like to point out that entries in the IMDS system are also often ordered at the same time as initial sample inspection reports. You can also use the former to identify the affected products.

As our customers are ultimately legally responsible for the design, which also includes the choice of material and/or approval, you should also consider the above information for future new products and/or orders. We would like to remind you that we will not/are unable to accept any liability for any resulting damages.

If you would like to use alternative materials in the future, please send us your specific inquiries and material wishes in good time so that we can prepare a quote beforehand.

In view of our wide range of products and the fact that we also rely on our preliminary suppliers to observe their statutory obligations, we are sure that you will understand that we cannot readily make any legally binding declarations beyond this one.

SCIP database

In the following table, which is updated continuously, products that you ordered are shown with the respective corresponding SCIP number if they contain > 0.1% of lead.

Please read up on the terminology on the “product description/category” using the documents that we transmit, such as the order confirmation, invoice, delivery note, packaging label, etc.

Product description/Category	Identification No. = Material No.	SCIP No.
Bushings	1.0502 (steel)	0a135f0a-fe81-406f-a962-4d4c5e7c9c89
	1.0504 (steel)	80bf2ce6-e975-441f-baf2-0964c56d1ecb
	1.0718 (steel)	ef7facae-8621-4b65-8104-0407bacb98cf
	1.0737 (steel)	58d94042-880c-4482-9446-1b3f871c5c77
	CW602N (brass)	06328a0f-a378-4326-9d0a-1b7161993220
	CW603N (brass)	9d629942-31fe-46fa-bf00-764e636ad2c9
	CW608N (brass)	a9a85ebc-20a2-41cd-a4e2-4bbbed82a2ac
	CW612N (brass)	e29bf375-ca4f-4ee1-a752-80f61e39ef74
	CW614N (brass)	724e63ae-eec0-4d42-9d42-e042cee6eb9f
	CuZn38Pb1.5 (brass)	24e547f0-ff40-4547-8548-5ce0afe02992
	EN AW - 2007 (aluminum)	84f3fc91-202d-4952-9c63-6e9b25f217dd
	EN AW - 2011 (aluminum)	749fe07b-428f-455e-a877-afaf4cffd838
	EN AW - 6012 (aluminum)	31c1bc0b-7931-4ddc-988f-66def97f834a
	EN AW - 6026 (aluminum)	85967ff6-08a4-4f26-82fb-b48980aaa13a
	CC493K (bronze)	c8b4d5b6-2b88-4fdf-8db5-a4306167386b
CW113C (copper)	77681e47-278b-466d-837a-fc4cf58d2b80	
Threaded bushings	1.0502 (steel)	c019ae39-d28d-48e2-bfdc-15b1a976a04b
	1.0504 (steel)	d6b4621d-2e75-4f2e-a6b9-6e25962034b9
	1.0718 (steel)	ccb91436-86d3-4357-add1-8d8f8a73261d
	CW603N (brass)	0320e15d-ea10-49bc-96ff-d72ffa9204bf
	CW608N (brass)	04a74321-1d38-4cda-b7c5-e13453d91853
	CW614N (brass)	7644dda2-f112-4780-89dd-3cb37bb76e2e
	EN AW - 2007 (aluminum)	3198c9ac-3af4-40f8-974c-2995da2f8377
	EN AW - 2011 (aluminum)	b0a2a08f-4b8a-4442-8f55-3bf632d94b91
Bolts	1.0502 (steel)	1f7ebfec-0df5-4501-b54f-d60b7c235029
	1.0504 (steel)	4aca2f1a-2c63-40f6-86b6-f8c0d9935247
	1.0718 (steel)	5d612ee3-66af-4f12-97ef-85f492b21061
	1.0737 (steel)	a6179c30-a880-4979-bbcd-d8afa477620f
	CW608N (brass)	381b1d07-c4fa-4e6b-af3e-adf4b20ded43
	CW614N (brass)	366152a6-4ee9-4902-8cb5-cf5c8991d17b
	CuZn38Pb1.5 (brass)	c6224266-22ea-4edd-834a-0b128f73283d
	EN AW - 2007 (aluminum)	694ae99d-443d-4584-8998-d2e5bc58dc7b
	EN AW - 2011 (aluminum)	ab88e7fc-06b7-46cd-b4c3-869beee742b8
	EN AW - 6012 (aluminum)	e28121e1-5b96-4f2f-97d8-d1e8c0e71506
EN AW - 6026 (aluminum)	859b8dbf-712a-4667-985a-da5465a87174	
Threaded bolts	1.0502 (steel)	29300306-02c1-47af-87e3-b873d3c8712e
	1.0504 (steel)	12a6917e-3265-45ec-b655-b6fa289e7c78
	1.0718 (steel)	808e8210-a9a8-49f3-8ebc-978e70017a8e
	CW608N (brass)	7a7fb2b9-7475-41a9-b8dd-693969be4bae
	CW614N (brass)	96bffb88-e693-43ac-8f13-7ba112710633
	CuZn38Pb1.5 (brass)	1264cb4b-8655-4da7-ac29-a411ef67ec0d
	EN AW - 2011 (aluminum)	30a2cbfc-c249-4179-8581-ff8ccbe64f13
	EN AW - 6012 (aluminum)	7771a578-66d0-405d-aaa5-543ac8ca1310
Oval bushings	1.0718 (steel)	776380cb-064a-4203-86b5-516ed3dd2122
	CW614N (brass)	21ab5373-5dc2-427e-8758-ca7cad7411be
Special parts	1.0718 (steel)	74829b5c-d3d7-466e-a40b-e9ecb3511bc4

Implementation of REACH in our company

We receive regular information about proposed substances for the Candidate List, public consultation procedures, updates to the Candidate List² as well as the relevance of the SVHC, among other things, from the “Environmental Protection and Workplace Safety” expert group of the WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. [WSM Steel and Metal Working Trade Association]. However, the fields of application published by the SVHC already show that the delivered products possibly do not contain other substances as well³.

With the procedure detailed in this letter on the practical implementation of our “duty to communicate information” in accordance with the REACH Regulation, we observe the legal requirements and recommendations of the WSM Wirtschaftsverbands Stahl- und Metallverarbeitung e.V.

This declaration relates exclusively to the products that we deliver. Changes to the products within the scope of subsequent processing are not covered.

² <http://echa.europa.eu/candidate-list-table> and <http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste.html>

³ <http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste-Verwendung/Kandidatenliste-Verwendung.html> and <http://echa.europa.eu/web/guest/information-on-chemicals/candidate-list-substances-in-articles-table>