

Compliance with REACH legislation (EU Directive 1907/2006)

REACH – „Registration, Evaluation, Authorization and Restriction of Chemicals“

Dear Sirs,

We thank you for your inquiry concerning "safety data sheet" (SDS) obligations and information obligations for "substances of very high concern" (SVHC) in our articles according to Art. 31 and 33 of the REGULATION (EC) No 1907/2006 and give you the following statement:

Art. 31 para. 1 REACH regularizes that the supplier of a substance or a preparation shall provide the recipient of the substance or preparation with a safety data sheet compiled in accordance with Annex II, where [...]. In undisputed and unanimous opinion (cf. EUROFER position paper, 29.08.2008) our semifinished products (wire) as well as our products themselves (mesh) are concerned as articles according to Art. 3 para. 3 REACH, that are not safety data sheet obliged. Irrespectively of product safety obligations for our articles, that will be taken notice of in every delivery, of course, due to a lack of statutory duty we are not able to provide you with safety data sheets according to the regulation.

According to Art. 33 para. 1 REACH, any supplier of an article is obliged to provide the recipient of the article with sufficient information, available to the supplier, to allow safe use or, as a minimum, name the substance of the SVHC-candidate list (meeting the criteria in Article 57 and identified in accordance with Article 59 para.1) if this substance exceeds a concentration of 0.1 per cent in weight (w/w) of the article and respectively PFOA <25ppm/ its salts <1000ppm of the article.

In applicable cases we will fulfil this obligation, of course, in order to ensure our customer's accustomed safe handling of our high quality products. **We are keeping in close contact with our own suppliers and up to now, we have not received any information about candidate list-SVHCs contained in our products whatsoever. Therefore, we assume that (according to information available to us at this point) our products do not contain any of the candidate list-SVHCs above the concentration limits set forth obliging us to inform recipients. Changes regarding this issue would be advised to you according to laws and regulations.**

We will inform you immediately about relevant changes of our products, the supply availability and the quality caused by REACH for the products/ parts within our relationship with your company and will, in the single case, propose appropriate measures for agreement with your company.

If you have further questions concerning REACH in our company do not hesitate to contact the following person:

Engelbert Wegenke, Phone +49-(0)-2421-803-208, engelbert.wegenke@gkd.de

Sincerely,

i.A. Engelbert Wegenke
– Health and Safety Manager –

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