

REACH Regulation (EC) No 1907/2006

January 23, 2024

Our metal products, such as those reworked in Switzerland and exported to the EU, are articles. This determination is based on the "Guidance on Substances in Articles" (see Guidance on requirements for substances in products:

(<https://echa.europa.eu/en/guidance-documents/guidance-on-reach>)
classifying metals in massive or wrought form as articles.

According to this guidance, the substances contained in articles need not be recorded, except in the case where a substance exceeds 1 ton per year per manufacturer or importer and if the substance is intentionally released from the article. Manufacturing processes of our products such as machining, grinding, welding, etc., as normal wear and tear are not considered as intentional releases.

It should be noted that if a metal product is intended to be melted, such as ingot materially transformed, it will be considered as a substance (pure metal) or preparation (alloy) whose components are subject to the Registration requirements.

Substance of Very High Concern - (SVHC)

For articles containing a substance classified by REACH Agency as substances posing a significant threat - Substance of Very High Concern - (SVHC) with greater than 0.1 wt% concentrations, the manufacturer or importer is under the obligation to inform the recipients of the article the presence of the substance and the conditions of safe use of the article. As exclusive representative of Materion, supplier of beryllium, beryllium-containing alloys and beryllium oxide, it is important to note that beryllium is not part of the list of SVHC.

If any of our products should contain a listed substance, you would be informed and we will ensure that your use is included in the registration dossier for the substance. The purpose of the authorization is to ensure that the risks from substances of risk are properly controlled or a substitution is made if it is economically and technically feasible.

In the last updated List of substances <https://echa.europa.eu/fr/candidate-list-table>, our products contain no substances which are candidates for approval by the agency.

We ask you of your understanding that due to the large number of enquiries, we are not able to respond to every enquiry individually.

Aziz Ibazene
Quality Manager

