

REACH (EC No. 1907/2006)

(Registration, Evaluation, Authorization and Restriction of Chemicals)

Editing status 29.03.2023

Declaration on the implementation of REACH for lead-containing products
 (turned parts made of copper, steel and aluminum alloys)

Statement on: Information requirements for suppliers of articles according to Article 33 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) published on 30 December 2006 in the Official Journal of the European Union 396/1.

Dear valued customer,

Thank you for your inquiry regarding compliance with the information requirements on Substances of Very High Concern ("SVHC"; Candidate List of Substances of Very High Concern for Authorization) in articles according to Article 33 of Regulation (EC) No. 1907/2006 (REACH Regulation). The REACH Regulation imposes on our company, in the role of "downstream user" and as "supplier of an article", the obligation to pass on information along the supply chain. Unfortunately, there is often a lack of clarity among many of those affected as to what these information obligations actually mean. This often leads to companies along the supply chain asking each other, for example, to confirm the "REACH conformity" of articles. However, such declarations are not provided for by the REACH Regulation. They merely cause considerable additional work for the companies, but generate neither legal certainty nor any other real benefit for the parties involved. Therefore, we would like to inform you which information you will receive from us as a "supplier of an article" according to the requirements of the REACH regulation.

Information obligations according to Art. 33 REACH regulation

Of course, we duly comply with this obligation in appropriate cases in order to be able to guarantee our customers the usual safe handling of our high-quality products.

In this context, we would like to inform you that our supplied article(s), see table, contain the following substance of the current candidate list in concentrations higher than 0.1 mass percent (w/w):

substrate	CAS/EG-number	List	Recording date	Note
Lead	CAS: 7439-92-1 EG: 231-100-4	SVHC	27.06.2018	The inclusion of lead as an SVHC on the candidate list essentially triggers related information obligations in the supply chain.

We are in close contact with our suppliers. Accordingly, based on the information available to us, we assume that there are no other SVHC in the concentration limits of a legally required information obligation in our products besides lead. Of course, we would inform you about any changes in accordance with the legal requirements and coordinate suitable measures with you in individual cases. In view of our wide range of products and since we are also dependent on our suppliers' compliance with the legal obligations, you will certainly understand that we cannot make any legally binding declarations beyond this without further ado.

Implementation of REACH in our company

We are regularly informed about proposed substances for the candidate list, public consultation procedures, updates of the candidate list, as well as the relevance of SVHC via the specialist group "Environment and Occupational Health and Safety" of the WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V., in which we as a company of the Fachverband Metallwaren- und verwandte Industrien (FMI) e.V. are also involved. However, already from the published areas of use of the SVHC it is currently clear that - with the exception of lead - these substances are probably not contained in the articles supplied.

By proceeding on the basis of this letter in the practical implementation of our information obligations under the REACH Regulation, we are following the legal requirements, the recommendations of the WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. and our Fachverband Metallwaren- und verwandte Industrien (FMI) e.V..

This declaration relates exclusively to the product(s) supplied by us. Changes to the product / products in the course of further processing are not covered by this.

Yours sincerely

Please address your inquiry to your MTCON contact person in the sales department or to the following

e-mail address: info@mtcon.eu

REACH company contact

Igor Petreski
MTCCONNECTIVITY power2pcb GmbH
Hauptstraße 18
D-74676 Niedernhall

Tel.: +49 (0) 79 40 / 98 99 98 -1
Fax.: +49 (0) 79 40 / 98 99 98 -9
Email: info@mtcon.eu