



Registration Evaluation & Authorization of Chemicals – REACH (EC1907/2006)

07/29/2022

Registration, evaluation and authorization of chemicals, or REACH (EC 1907/2006), is a European directive designed to provide safety, health, environmental and use information about chemical substances to the ECHA and to downstream users. REACH requires producers and importers to register chemical substances produced in or imported into the EEA market. The goal of the REACH directive is to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry. Personnel here at Corrosion Materials have assessed the requirements and the impact this regulatory system will have on alloys and those who import them into European countries. The conclusion is that registration under REACH is only for substances, not preparations or articles. Because alloys are considered articles, registration is not necessary. However, the substances that make up these alloys may be subject to registration.

This letter certifies that to the best of our knowledge the products we supply do not contain substances of very high concern above concentrations of 0.1% which is the requirement in REACH, nor are any of the elements that make up the alloys, are on the candidate list as of 6/10/2022 in quantities about the threshold.

<https://echa.europa.eu/en/candidate-list-table>

A handwritten signature in black ink that reads "Jacob Rodriguez".

Respectfully,
Jacob Rodriguez
Technical Sales Engineer, Metallurgist

REACH references

- Definitions:
 - Preparation: Article 3(2)
Alloy: Article 3(41)
- Registration: Article 6
- Alloys as special preparations: Recital 31, Annex I and Annex II



2262 Groom Road
Baker, LA 70714
800.535.8032 Toll Free
225.775.3675 Phone
225.774.0514 Fax

12305 Cutten Road
Houston, TX 77066
800.455.2276 Toll Free
713.939.0364 Phone
713.939.1126 Fax

375 W. South Frontage Road
Bolingbrook, IL 60440
800.706.7471 Toll Free
630.226.1043 Phone
630.226.1044 Fax

9 Saint Mark Street
Auburn, MA 01501
844.442.0818 Toll Free
774.321.6212 Phone
774.321.6206 Fax

Registration Evaluation & Authorization of Chemicals – REACH (EC1907/2006) ANNEX XIV and XVII

10/17/2022

Annex XIV is the authorization list that identifies substances that are prohibited unless exempted or authorized. Of the 59 chemicals in the REACH authorization list (ANNEX XIV) as of 10/17/2022, none are present in concentrations over the thresholds listed.

Annex XVII is the restricted substance list of REACH. This list covers substances that are limited or possibly banned from being in the EU market. There are conditions for uses for each substance on this list.

- Nickel and its compounds are listed in the REACH restricted list (ANNEX XVII) as of 10/17/2022. But this ANNEX restricts the use of the use of these substances in articles that are intended to be worn by humans for a long time and have direct contact with the skin. Our products are not intended for such a use and should not be used under these conditions.
- <https://echa.europa.eu/documents/10162/3bbe9024-52a6-8e63-5581-e686331eb459>
- Lead and its compounds are listed in the REACH restricted list (ANNEX XVII) as of 10/17/2022. But this ANNEX restricts the use of the use of these substances in articles that are intended to be worn by humans for a long time and have direct contact with the skin, such as jewelry or objects that would be placed in the mouth by children that contains concentrations of lead equal to or greater than 0.05% by weight. Our products are not intended for such a use and lead, if present in an alloy should be below this concentration.
- <https://echa.europa.eu/documents/10162/851fb88e-9867-c5a0-bf15-2678ad831be6>



Respectfully,
Jacob Rodriguez
Technical Sales Engineer, Metallurgist

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