

Dear Sir or Madam,

Statement on the EU Registration, Evaluation and Authorisation of Chemicals (REACH) Directive and information according to Art. 33.

The objective of the Directive, as is already well known, is to ensure that only chemical substances that have been registered are actually put into circulation. By implementing the assessment, approval and restriction of such substances, this Directive contributes to a large degree to protecting our health and the environment. We fully support this objective.

All European manufacturers and importers that produce or import one tonne or more of these substances a year are required to register them unless they are exempt from registration. A substance is also required to be registered by the manufacturer or importer if it is used in products in total quantities of one tonne a year and is intended to be released under normal, reasonably predictable conditions of use.

Since we are not and have not been either a manufacturer or an importer of such substances or their compounds, we are not able to contribute to the preregistration and later registration of these substances.

We are also not a downstream user so there is no requirement for communication between us and the manufacturer of the substances in terms of application-specific peculiarities. Products which are intended to release chemicals and contain particularly worrying substances are also not included in our product range.

We shall continue to observe the next phases of the implementation of this Directive in particular with reference to the publication of registered substances and the presence of any such substances in our products, which we source from numerous manufacturers in various industrial sectors.

In the event that Safety Data Sheets should become necessary for any products, we shall check the accuracy of them with regard to the details of registered substances including the registration numbers.

We shall, of course continue to meet our obligations to keep you informed.

To facilitate the implementation of these tasks, we have appointed an Officer who will be pleased to answer any further questions in connection with this issue.

The item Industrietechnik GmbH deals with products which are articles according to REACH. These articles are mainly provided by suppliers within the EU and in some particular cases from outside the EU.

Therefore and according to Art. 33 of the REACH Regulation, we have the obligation to inform our customers if substances of very high concern (SVHC) are contained in a concentration above 0,1% weight by weight (w/w).

In your interest and to ensure a high delivery and product safety, this duty to communicate information is very important to us. We fulfil the legal regulations stipulated in Art. 33 of REACH as follows:

- Our EU suppliers of articles have the obligation to inform us when some of their delivered products contain SVHCs in a concentration above 0,1% w/w on a voluntary basis and without delay.
- We agree on special conditions with all our non-EU suppliers of articles, as the REACH duty to communicate information does not apply automatically. Therefore, we ask our non-EU suppliers to assure us without delay that a product delivered to us contains a SVHC in a concentration above 0.1% w/w threshold value or, on the contrary, that none of these substances are contained in their products.

The additional inclusion of lead metal in the REACH candidate list on 27 June 2018 now also extends the circle of information providers to articles providers, as item Industrietechnik GmbH is. Some components of our articles contain lead-containing alloys (lead content > 0,1% w/w), which is now identified as SVHC in concentrations greater than 0,1% (w/w).

Currently, lead remains an important alloying element for aluminum, free-cutting steels and copper materials. Lead-containing materials are a well-known and tested alloy system that offer a number of technological advantages.

In contrast to mixtures (alloys/powders), the resulting products (castings, semi-finished products, components) are not subject to classification and labeling requirements under the CLP Regulation, and accordingly there is no obligation to make safety data sheets available under the REACH Regulation. The hazardous substance classification, the general rules for the safe handling of lead-metal and the range of applications of our products remain unchanged. If you need detailed information about the use of lead in our articles, please contact us.

Furthermore, according to current knowledge and the information provided by our suppliers about our products, our articles do not contain another SVHC in a concentration exceeding 0.1%.

The list of substances of SVHCs has been officially published on the website of the European Chemical Agency (ECHA).

[http://www.echa.europa.eu/chem\\_data/candidate\\_list\\_table\\_en.asp](http://www.echa.europa.eu/chem_data/candidate_list_table_en.asp) .

However the supplier of the following products, 

Door Stop Seal 8 30	0.0.616.57
Door Stop Seal 8 40	0.0.617.31

informed us that possibly marks of PAH could occur during the production process and that products aren't conform with the EC Directives 2002/72/EC and 2005/69/EC.

If you have further questions regarding the fulfilment of the REACH Regulation in our company, please contact us.

Yours faithfully,

item Industrietechnik GmbH  
Dipl.-Ing. M. Allwicher  
REACH delegate



Stephan Buchmann  
Managing Director  
Solingen, August 2023