

Klein Umformtechnik GmbH, Postfach 31 12, 57244 Netphen-Deuz

To all Business Partners of
KLEiN Umformtechnik GmbH
und
KLEiN GmbH & Co. KG
Umformtechnik Sachsen

REACH-Information

Date

16.04.2024 (DD.MM.JJJJ)

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

Dear Sir or Madam,

Thank you for your inquiry regarding the environmental compatibility of our products. Our company has been certified according to the worldwide environmental management standard (DIN EN) ISO 14001. In accordance with our environmental policy, we are particularly committed to the issues of legal compliance, continuous reduction of environmental impact (including pollutants) and improvement of environmental performance in supply-processes, production-processes and products.

We would like to inform you about the European Regulation 1907 /2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (hereinafter referred to as "REACH") as follows:

A) Our company is not a manufacturer, a producer, or an importer of chemicals within the meaning of Articles 6 and 7 of REACH, but it is included in the system as a so-called "downstream user". In this function, therefore, there is basically neither a registration nor a dossier obligation for substances, chemicals, or articles for us.

B) The responsible ECHA (European Chemicals Agency) publishes a list of SVHC (Substances of very high concern), the so-called Candidate List¹. This list is subject to constant updating. An information obligation according to REACH Art. 33 for substances in articles only applies to these SVHC substances in a concentration greater than 0.1 % by mass.

C) We oblige our suppliers to comply with REACH, unless they are committed to comply by legal in order to receive the necessary information about SVHC substances in the supply chain if required.

D) We closely monitor the development of SVHC substances according to Art. 57 REACH, receive information on planned or new substances from WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. and the industry association IBU Industrieverband Blechumformung e.V. and check, whether these substances can occur in our products. If possible, we ban or avoid SVHC substances in our products.

¹ <https://echa.europa.eu/candidate-list-table>

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E) Lead and several lead compounds have been included in the REACH candidate list since 2018 as substances of very high concern (SVHC). This triggers a mandatory information obligation according to Article 33 REACH if an article contains more than 0.1 % by mass lead or one of the lead compounds on the candidate list (more information at the helpdesk²).

According to information currently available to us, some components of our stamping tools and forming tools and products contain the SVHC substance lead (CAS 7439-92-1) as an alloying element, e.g. brass, in concentrations greater than 0.1 %. The use of this substance complies with the applicable relevant legal regulations. When used as intended according to operating instructions, safe use is basically ensured and there is no danger to health or the environment. Safety instructions are therefore not required.

A notification obligation according to Article 7 (3) REACH to the EU Chemicals Agency ECHA is also not applicable, as exposure of humans or the environment can be excluded under normal or reasonably foreseeable conditions of use, including disposal. If a different risk situation arises, we will review our requirements and adjust them if necessary.

F) In the course of our management processes, we have implemented internal procedures and controls, in order to realize constantly proper processes and REACH-compliant products.

For any further questions do not hesitate to contact us.

Sincerely,

KLEiN Umformtechnik GmbH
KLEiN GmbH & Co. KG Umformtechnik Sachsen

sgd. ppa. Born – Head of Material Management & Lean Management

² https://www.reach-clp-biozid-helpdesk.de/DE/Home/Home-English_node.html