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REACH Regulation

Thurmetall produces and trades products which are defined as articles under chemicals legislation. Therefore, Thurmetall is a "downstream user" within the meaning of REACH. We mainly source the articles from European suppliers.

Pursuant to the criteria set down in the REACH Regulation, we are therefore not subject to any registration obligations. This also applies, in particular, because no chemical substances are intended to be released under normal or reasonably foreseeable conditions of use (see Article 7 [1] of the REACH Regulation).

The products which you purchase from us are not subject to registration within the meaning of the REACH Regulation.

Consequently, any chemical substances which have to be registered and which may be contained in our articles have to be registered solely by our upstream suppliers.

1) Pre-registration and registration

Acting in our own interests and in order to guarantee a high degree of product safety, we track the implementation of REACH and the resulting requirements vigorously. We have contacted our upstream suppliers in this regard. The products distributed by us include substances or preparations which are essentially in widespread use or which are established on the market.

Against this background, many of our upstream suppliers have already indicated to us that the relevant products have been pre-registered or will be registered at a later date!

2) Duty to communicate information on substances in articles in accordance with Article 33 of the REACH Regulation

We are also in contact with our suppliers in respect of the duty to provide information in accordance with Article 33. Under Article 33 of the REACH Regulation, our supplier must inform us if certain substances which are a particular cause for concern are contained in the product in a concentration above 0.1 % weight by weight (w/w). If we are given this information by our supplier, we will pass it directly on to you. Needless to say, this also applies to substances which are subsequently deemed to be of very high concern (SVHC) as mentioned in the appendix to your letter.

If you have any further questions about how the REACH Regulation is implemented in our company, feel free to contact us at any time.

Yours faithfully

Thur Metall AG

Peter Kretz Sales director (CSO) René Frei Quality Manager