



Julius Pfisterer



Statement on “substances of very high concern” (SVHC) according to the Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18th December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), published on the 30th December 2006 in the Official Journal of the European Union 396/1.

Dear Sir or Madam,

We thank you for your inquiry concerning our information obligations for “candidate list of substances of very high concern for authorization” (so called “SVHC”) in our articles according to Art. 33 of the REACH-Regulation (EC) No. 1907/2006. REACH provides our company in the role of a “downstream user” and a “supplier of an article” with several obligations on giving and disseminating product information along the supply chain.

Unfortunately it is unclear to many companies what these information obligations concretely imply. This often leads to situations where different companies along the supply chain request one another to certify the “REACH-conformity” or to give a full substance analysis of their products and to complete apparently adequate documents. These kinds of statements are not intended by the REACH-regulation and are also not helpful in complying with the mandatory communication and information obligations. They are just causing a large amount of time and effort for most companies without resulting in legal certainty or any other benefit for the involved parties.

Therefore we would like to let you know in detail what kind of information we as a “supplier of an article” will provide to you according to the REACH-regulation.

Our information obligation according to art. 33 par. 1 REACH

The products we supply are legally defined as articles under REACH¹. According to Art. 33 para. 1 REACH, any supplier of an article is obliged to provide the recipient of the article with sufficient information, available to the supplier, to allow safe use or, as a minimum, name the substance of the ECHA-candidate list (meeting the criteria in Article 57 and identified in accordance with Article 59 para. 1) if this substance exceeds a concentration of 0.1 percent in weight (w/w) of the article. In applicable cases we will fulfil this obligation, of course, in order to ensure our customer’s accustomed safe handling of our high quality products.

We are keeping in close contact with our own suppliers to keep the information available to us up-to-date and until now, we have not received any information about candidate list-SVHCs contained in our products.

Therefore, we assume that (according to information available to us at this point) our products do not contain any of the candidate list-SVHCs above the concentration limits set forth obliging us to inform recipients. Changes regarding this issue would be advised to you according to laws and regulations. Because of our broad array of products and due to the fact that we are depending on our suppliers compliance to fulfil their legal obligations, too, you will certainly understand that we are not able to give further legally binding declarations without further ado.

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REACH-implementation and REACH-processes in our company

We are in close contact with our suppliers of the relevant raw materials, which are processed in our products and let us give binding information if any listed SVHCs above 0.1 percent in weight are included in the raw materials we receive from our suppliers.

To date, none of the products we receive from our suppliers contain substances in excess of 0.1% listed on the most recent candidate listing of SVHCs.

In general, however, we must state that for your products we only use the materials and surfaces that you require on your drawing and therefore we have no influence on the composition of the respective materials and the associated guidelines and regulations. We reject any liability associated with this in advance.

Sincerely,

Andreas Ketzer
Managing Partner

Julius **PF**isterer GmbH & Co.KG

This letter is created electronically and is valid without signature.

¹Art. 3 no. 3 REACH: article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.