

Statement on the REACH regulation (EG 1907/2006) and “substances of very high concern” (SVHC) candidate list of 10.06.2022 on the information obligations for manufacturers of preparations and products according to Article 33 of the regulation of the European Parliament and of the Council on the registration, evaluation, approval and restriction of chemical substances (REACH).

Dear Sir or Madam,

We thank you for your inquiry concerning our information obligations for “candidate list of substances of very high concern for authorisation” (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.

We would therefore like to tell you what information you will receive from us as a “supplier of an article” in accordance with the requirements of the REACH regulation.

To our information and reporting obligation in the so-called SCIP database according to Art. 33 par. 1 REACH

The products from Hailo 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 list² (meeting the criteria in Article 57 and identified in accordance with Article 59 para.1) if this substance exceeds a concentration of 0.1 per cent in weight (w/w) of the article. As well as reporting the substance to the SCIP database.

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 whatsoever. We therefore assume that (according to the information available to us) our products do not contain any substances on the candidate list SVHCs above the specified concentration limits that oblige us to inform the recipient. You will be notified of changes to this subject in accordance with 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.

REACH-implementation and REACH-processes in our company

Especially under the aspects of REACH and the new European Chemicals Policy our German umbrella association, the WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.

¹ Art. 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

² http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

organised a project group “REACH” which regularly informs us about public consultations, new added substances (“SVHC”) to the candidate list and about the affectedness of our companies.

German authorities as well as leading research institutes and scientific networks permanently analyse the range of use for the actual 224 substances included in the candidate list (last updated on June 10th, 2022). According to these analyses for the time being, substances of very high concern for authorisation are unlikely to be included in our products.³

By sending you this information letter to fulfil our information obligations as a “supplier of an article” according to art. 33 par. 1 REACH we are following not just the statutory provisions, but we are also following the suggestions of our “Federal Ministry of Economics and Technology” (BMWi) as well as of our umbrella association WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.

We will inform you immediately about relevant changes to our products, to the supply availability and to the quality caused by REACH for the products and/or parts within our relationship with your company and will, in individual cases, propose appropriate measures for agreement with your company.

Sincerely,



Hailo-Werk
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Hailo-Werk Rudolf Loh GmbH & Co. K.G.
REACH - Agent i.V. Achim Nauroth

Haiger, June 22st, 2022

³ http://www.reach-clp-helpdesk.de/clin_136/reach/de/Themen/Kandidatenliste/Kandidatenliste-Verwendung.html.