

**Subject:** EU-Regulation (EC) No. 1907/2006 (REACH)

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30.06.2025

Dear Sir or Madam,

Thank you for your inquiry regarding the environmental compatibility of our products.

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 processes, production 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:

- Our company is not a manufacturer, producer or importer of chemicals within the meaning of Articles 6 and 7 of REACH, but 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.
- The responsible European Chemicals Agency (ECHA) publishes a list of substances of very high concern (SVHC), the so-called candidate list. This list is subject to constant updating (link: [echa / candidate-list en](https://echa.europa.eu/candidate-list)). 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.
- We oblige our suppliers to comply with REACH in order to receive the necessary information about SVHC substances in the supply chain if required.
- We closely monitor the development of SVHC substances according to Art. 57 REACH, receive information on planned or new substances from our association and check whether these substances can occur in our products. If possible, we ban or avoid SVHC substances in our products.
- Lead and a number of 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 % w/w lead or one of the lead compounds on the candidate list (more information: [BAuA-Hilfestellung](#)).
- According to information currently available to us, some components 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 specifications / works test certificates / operating instructions, safe use is basically ensured and there is no danger to health or the environment. Safety instructions are therefore not required.
- However, the lead content in the following products is greater than 0.1%:
  - CuZn36Pb3
  - CuZn39Pb2
  - CuZn38Pb1.5
  - CuBe2Pb (Becu33-25)

Please check the respective application for these materials during the use phase and assess whether these materials could be replaced by other substances.

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

If you need any further information on the subject of substance policy, please do not hesitate to contact us.

Yours sincerely

(Management)

