

INOXMARE SRL | VIA POMPOSA, 51/I | 47924 - RIMINI
To all customers of Inox Mare S.r.l.

Rimini, Feb 2023

EU Chemicals Regulation EG 1907/2006 - REACH

Ladies and Gentlemen,

Thank you for your enquiry regarding the EU Chemicals Regulation (REACH) and the resulting obligation to report in ECHA's SCIP database.

As dealer / importer of articles (screws, nuts, small parts, etc.) we take our obligations from the REACH VO seriously.

We are not obliged to register under the REACH Regulation, nor are we obliged to notify under Article 7 II of the REACH Regulation.

According to Art. 33 of the REACH Regulation, information must be provided within the supply chain about substances of very high concern according to the current candidate list in articles with a concentration of more than 0.1% by mass.

As this is not the case for any stainless steel alloys that we supply, we are not affected by the Regulation and therefore do not need to register in ECHA's SCIP database.

All our products from the material groups A1, A2, A4, A5, D6 (Duplex) are compliant with the EU chemical regulation EG 1907/2006 - REACH.

Further information from Fachverband des Schraubengroßhandels e.V. (FDS) can be found in the attached leaflet.

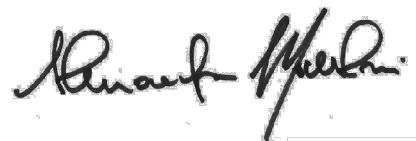
If you have any further questions, please do not hesitate to contact us.

Yours sincerely,

INOX MARE srl



Riccardo Borgognoni
- PURCHASING MANAGER -



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- TECHNICAL DEPARTMENT -

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EU regulation EC 1907/2006 REACH: Obligations for Fasteners

The REACH regulation concerning chemicals, has come into effect since June 01, 2007. REACH distinguishes between substances, preparations and articles, with several obligations.

According to Art. 3 of REACH regulation, fasteners are defined as “articles”. “Articles” are objects which function is determined to a greater degree by their shape and design than does their chemical composition.

Obligation for registration and reporting at ECHA (European Chemicals Agency)

Article 7(1) 1 of REACH regulation, determines there is an obligation for registration of articles only if they contain substances that are intended to be released under normal or reasonably foreseeable conditions of use and if they contain these substances in excess of 1 ton per year and per producer resp. importer. In general, this is not applicable to fasteners.

Even fasteners with a coating system that protects against corrosion through self-sacrificing, have no obligation for registration. Reason is that not the substances itself would be set free, but its reaction products. This exemption is documented in Art. 2, par. 7(b) and Annex V,(3) of REACH regulation. Substances which result from a chemical reaction occurring upon end use and which are not themselves manufactured, imported or placed on the market, are exempted.

Apart from the above, Art. 7 (2) of REACH imposes rules for notification if articles contain a substance of very high concern (Art.57) according to the Candidate List (Art. 59 of REACH regulation) if the concentration is over 0,1 % (w/w) and if the total weight of this substance (not of the articles) is more than one ton per importer/producer and per year.

For fasteners, in general the above mentioned obligation for notification is not applicable, as the percentage of substances of very high concern is significantly lower than 0,1%. In some exceptions, this has to be controlled.

Chemo-technical products (e.g. aerosols, glues, seals) are not articles, but preparations. For “preparations” its chemical components are obliged to be registered. For preparations imported into the EU it is the importer that has the obligation for registration, according to Art. 6 of REACH regulation, if more than one ton is imported per year.

If preparations are produced in the EU, the producer has the obligation for registration.

Obligations in the supply chain

Traded articles can be subject to reporting or information duties, independent if they are procured within or outside the EU.



For all articles that contain substances of very high concern according to the Candidate List with a threshold of more than 0,1% (weight), Art. 33 of REACH regulation imposes the obligation to inform the supply chain automatically about the substances of very high concern according to the latest edition of the Candidate List. Accordingly the supplier has the obligation to provide the recipient of the articles with the available information on the safe use of the article, at least with the name of the substance.

Amongst others, the substance „Chrome trioxide“ (Chrome(VI)oxide) is on the Candidate List. This substance appears in yellow, black and olive colored passivation layers and also in the zinc flake coating Dacromet, however in a concentration well below 0,1 % of the product weight. Therefore no obligation for information to downstream users is imposed.

This is to be distinguished from the obligations by ROHS directive or ELV that impose maximum thresholds for some substances in articles that are placed on the market.

Only with the delivery of substances or preparations it can be required to provide a safety data sheet according to Art. 31 of REACH or information according to Art. 32 of REACH.

Berlin, 24 October 2012

Technischer Ausschuss of FDS