

## REACH Declaration (EC) No 1907/2006 – general statement

11 June, 2020

Dear Customer,

On 1<sup>st</sup> June 2007 the new European chemicals regulation (REACH) entered into force. This imposes certain duties to communicate information down the supply chain. Unfortunately it does not always seem to be clear to companies in the supply chain what these duties exactly comprise. As a result, companies along the supply chain are increasingly requesting of their suppliers to fill in extensive questionnaires on REACH and to sign “REACH compliance declarations” and similar documents. Such questionnaires and compliance declarations are not stipulated by the REACH Regulation and do not fulfil the prescribed duties to communicate information of the suppliers. They rather create an increased work load for both sides, but they provide no legal certainty, nor any other benefit for the companies affected. Therefore we would like to inform you about the concrete information you will receive from us according to the REACH provisions on communication down the supply chain.

We supply you with “**Classic Abrasive Products**” (coated abrasives, foam abrasives, non-woven abrasives, bonded abrasives), which **are regarded as articles under REACH**<sup>1</sup>. As a supplier of articles we have the duty to inform you about the substances that appear on the candidate list of substances of very high concern (<https://echa.europa.eu/de/candidate-list-table>) and are present in a concentration above 0.1% in the products you receive from us. We will closely follow the updates of this list.

*“**Classic Abrasive Products**” (coated abrasives, foam abrasives, non-woven abrasives, bonded abrasives) contain no substances from the candidate list of 18<sup>th</sup> of December, 2019 according to Article 59(1) of Regulation (EC) No 1907/2006 (“REACH”) above 0.1 % (w/w).*

Furthermore, REACH requires producers of articles to register substances contained in their products, if those substances are intended to be released during use. However, **there is no intended release of substances from abrasive articles during use**<sup>1</sup>. Consequently, we have no obligation to register substances under

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<sup>1</sup> This position is supported by the *Federation of European Producers of Abrasives* (FEPA).

REACH as producers of articles, and cannot provide you with a registration number for our product.

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In any case, you may be sure that **we are well aware of the REACH Regulation and committed to meeting our legal obligations**. This also implies that we are exchanging all information which is necessary under REACH with our own suppliers. As a matter of course we will also ensure that our products will continue to be available under REACH.

Best regards,  
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