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REACH

June 2018

REACH - the new EU chemical regulation

As of 1 June 2007 a new EU ordinance (EU 1907/2006) for the Registration, Evaluation, Authorisation and Restriction of Chemicals - called REACH - has come into effect, with elementary changes on the existing regulations on chemicals in Europe. Solely for the implementation of the new requirements the European Chemicals Agency (ECHA) was established in Helsinki and started operations as of 1 June 2008.

The declared aim of REACH is to improve the level of knowledge about the dangers and risks that chemicals may pose, to achieve a higher protection level for man and environment. REACH affects all chemicals, as well those which are in use for a long time. Moreover, REACH will shift the responsibility for the risk assessment of chemicals in large part from the authorities to the producers and importers.

In the centre of the new ordinance is the registration and evaluation process, in which communication within the supply chain is playing an essential role. Nearly all companies in the supply chain, like producers, importers, downstream users, are affected by REACH and have to fulfil particular obligations.

The entire implementation of REACH will last more than 10 years. The timetable set by REACH included a pre-registration phase running from 1^{st} June 2008 to 1^{st} December 2008. The schedule for the following registration was depending on the production volume and risk potential of the particular substances. Until 1 July 2018 all substances were supposed to be registered.

Substances of Very High Concern (SVHC) according to Annex XIV of the REACH ordinance are required to be approved separately and may be subject to restrictions on use. A first list of substances with such properties ("candidate list") was already issued by ECHA on 28.10.2008 followed by additional listings since then.

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As leading manufacturer of sanitary faucets and systems we have been closely engaged since the beginning with the new requirements.

Hazardous substances, chemicals

As we are neither producing chemicals or mixtures nor importing them to the EU, we are only affected by REACH as a so called "Downstream User". Registration obligations are inapplicable for us.

In this position, we depend mainly on the activities of our suppliers for securing our future supply with chemicals and mixtures. For this we are in close contact with our suppliers; this includes regular requests and confirmations on compliance with REACH requirements, too.

Products

Substances of Very High Concern (SVHC) according to the "candidate list" for Annex XIV of the REACH ordinance (current status: 27.06.2018 - 191 substances), are not included in our products (≥ 0.1 % per substance and product) with one exception.

This exception is lead. Lead (CAS-Number 7439-92-1 / EINECS 231-100-4) is on the "candidate list" since 27.06.2018. In our products lead is being applied as alloying constituent in non-ferrous metal (e.g.brass) respectively components mady of non-ferrous metal in concentrations > 0,1 %.

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