

REACH (EG Nr. 1907/2006)
(Registration, Evaluation, Authorisation and Restriction of Chemicals)

**Declaration on the implementation of REACH for articles containing lead
(e.g. strips, sheets, rods, profiles, billets etc. made of brass)**

- HME Copper Germany GmbH and its listed affiliates, hereinafter referred to as HME, supply products made of copper and copper alloys in the form of pressed and drawn tubes, profiles and rods as well as casted billets.
- According to the REACH Regulation, these are defined as *articles*. Furthermore, articles made of copper and copper alloys are not substances or preparations according to CLP/GHS and are not subject to compulsory labelling or classification.
- HME acts as a downstream user of the substances, which are contained in the products made of copper and copper alloys. Their use for the production of articles made of copper and copper alloys was taken into consideration during the REACH registration process.
- The leaded alloy articles contain the following substances of very high concern (SVHC) in concentrations above 0.1% (w/w) on the candidate list updated by the above-mentioned processing date. Current candidate list: <https://echa.europa.eu/candidate-list-table>

Substance	CAS / EINECS	List	Date of admission	Note
Lead	CAS: 7439-92-1 EINECS: 231-100-4	SVHC	27 Jun 2018	The inclusion of lead as a SVHC on the candidate list essentially triggers information obligations in the supply chain. The legal classification of lead as a hazardous substance, the regulations on the safe handling of lead and the range of applications of the articles made of copper and copper alloys containing lead supplied by HME remain unchanged.

- HME brass alloy articles may contain small quantities of restricted substances under [Annex XVII REACH](#). The common use of semi-finished brass products does not usually fall under any of the listed restrictions. It is up to the processing companies to observe the restrictions of use when placing their articles or products on the market:

Substance	CAS / EINECS	List	Date of admission	Note
Arsenic	CAS: 7440-38-2, EINECS: 231-148-6	ANNEX XVII	Unknown	The legal classification of lead as a hazardous substance, the regulations on the safe handling of lead and the range of applications of the articles made of copper and copper alloys containing lead supplied by HME remain unchanged.

- The packaging do not contain any of the substances (SVHC) listed in the candidate list updated up to the above mentioned processing status in concentrations greater than 0.1% (w/w).
Current list of candidates: <https://echa.europa.eu/candidate-list-table>
- All articles made of lead-containing alloys have been reported to the ECHA via SCIP database entry on the basis of the EU Waste Framework Directive (Directive 2008/98/EC) and the national legal requirements of the HME companies. Customers who require the reference numbers for further processing should contact the HME sales department.

HME Copper Germany GmbH

- According to Article 31 REACH, the preparation of a REACH Safety Data Sheet (SDS) for articles is not permitted. HME has compiled information regarding regulatory requirements as well as information on safe handling as a service in an "information sheet for articles". This can be found on our website at <https://www.hmemetal.com/services/downloadcenter/>. Alternatively, please send your request to your HME contact person in the sales department or to the following e-mail address: info@HMEmetal.com.
- You may find comprehensive information on REACH on the ECHA homepage: <https://echa.europa.eu/de/regulations/reach/understanding-reach>

Dipl.Ing. Heiko Stölting

HME-Representative REACH

Phone: +49 30 4097-290

E-Mail: heiko.stoelting@hmemetal.com

We confirm that the information involved in the drawing up of this document has been checked to the best of our knowledge for completeness, correctness and current relevance. We shall inform our customers about mistakes which transpire to exist in information included in this declaration as well as about amendments about which we become aware prior to a delivery. We declare our agreement with the fact that our information is to be used by our customers along the supply chain. We provide a guarantee for any damages which can be proved to ensue from intentionally incorrect or incomplete documentation.