

Declaration about semi-finished and finished steel products in REACH.

Semi-finished and finished steel products, except for lead steels which, in any case, represent an amount lower than 0.35%, are considered **articles** according to Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 **concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)**, as recognized by ECHA in a letter to Eurofer dated September 2, 2009.

<http://www.eurofer.org/index.php/eng/content/download/5030/26762/file/Reply%20ECHA%20on%20EUROFER%20letter.%202%20September%202009.pdf>

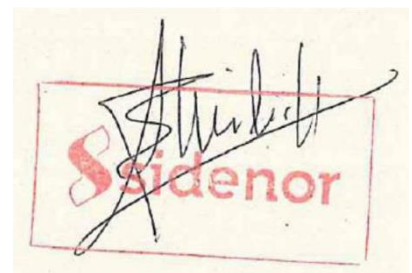
Therefore, they are not subject to registration.

On the other hand, the steels (articles) produced by Sidenor do not contain substances intended for release, or which release themselves, during their reasonable use, as indicated in Article 7 of the Regulation.

Likewise, our articles do not contain, substances above the declared thresholds (>0.1% of the weight), nor have these been added to them.

- They have not been subject to authorizations according to annex XIV
- They have not been included in the last review (25/06/2020) of the SVHC list (substances of very high concern). <http://echa.europa.eu/es/candidate-list-table>
- They have not been included in the candidate lists for the authorization process http://guidance.echa.europa.eu/authorisation_en.htm#candidate-list

Basauri, June 4, 2021.



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Declaration about semi-finished and finished lead steels products

Declaration about the presence in our articles of candidate substances to be considered as of very high concern and included in Annex XIV of the REACH Regulation and in the list published by ECHA, in accordance with Article 33.

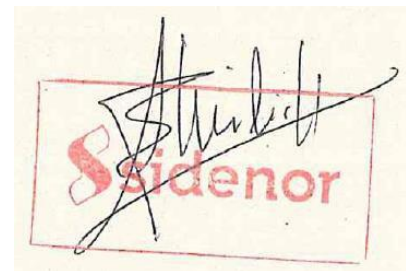
<https://echa.europa.eu/es/candidate-list-table>

The semi-finished products (after casting) / steel products are considered articles in accordance with Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), and as recognized by ECHA in the letter addressed to Eurofer (European Steel Association) on September 2, 2009.

<https://www.eurofer.eu/assets/publications/position-papers/reach-position-papers/Reply-ECHA-on-EUROFER-letter.-2-September-2009.pdf>

As a consequence, Sidenor Aceros Especiales SLU herewith informs that the semi-finished products / steel products supplied by us do not contain any of the substances included in the list of candidate substances in a concentration greater than 0.1%, except for the substance Lead with EC number: 920-238-7 used in lead steels to improve the machinability of the final product.

Basauri, June 4, 2021.



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