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To all customers of  
Zapp Precision Metals GmbH of the  
Unna and Ergste sites

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Member of the Zapp Group

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## **Declaration of our grades - General information for the locations ZPM - Ergste and Unna**

Dear Sir or Madam,

we would like to make the following statement with reference to your inquiry.

### RoHS:

For technical reasons, carrying over of undesirable elements (such as for example heavy metals) cannot always be prevented during production of stainless steels, particularly during the melting process. To our knowledge, the content of these elements in our products does not exceed 10ppm. On average, the proportions are considerably lower. For this reason, our stainless steels are designated as free from hazardous substances. Alloys which intentionally contain such elements at the customer's request are obviously excluded from this.

We would be pleased to supply you with more information with reference to specific material grades and qualities on request.

The metal Chromium does not exist in stainless steels as toxic six-valence Chromium. Though stainless steels normally include more than 10% of Chromium, all of them are in metallic form and therefore, valence of Chromium in stainless steels is zero. From thermo-dynamic reason, six-valence Chromium cannot be generated themselves in stainless steels. Thus, stainless steels are actually free from six-valence Chromium.

### **2011/65/EU (RoHS) / 2015/863/EU**

All materials supplied by Zapp Precision Metals GmbH are in accordance with above regulations.

## REACH:

**Statement on “substances of very high concern” (SVHC) according to the 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), published on the 30<sup>th</sup> December 2006 in the Official Journal of the European Union 396/1.**

We thank you for your request to **Zapp Precision Metals GmbH** regarding our information requirements for „Substances of Very High Concern” („SVHC”; Candidate List of Substances of Very High Concern for authorization) in our articles according to Article 33 of the REACH-Regulation (EC) No 1907/2006 (REACH).

As „downstream user” and as „supplier of an article” under REACH we are forced to pass on information along the supply chain. Unfortunately it is unclear to many companies what these information requirements actually mean. This often results in situations where companies along the supply chain urge each other to confirm „REACH compliance” of articles. Such statements are not intended by REACH. For companies they only cause additional expenses, but generate neither legal certainty nor other real benefit. Therefore we would like to inform you what information you will receive from us as „supplier of an article” in accordance with the requirements of REACH.

### **Information requirements according to Article 33**

The products we supply are legally defined as articles<sup>1</sup>.

According to Article 33(1) REACH, any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

If such cases occur we will properly comply with the information requirements in order to ensure the safe handling of our high quality articles.

Furthermore, we are in close contact with our suppliers. On the basis of our risk assessment there are no indications which will lead to a specific sample analysis up to now. According to the information available we currently assume that our articles do not contain any SVHC in a concentration above 0,1 % weight by weight (w/w). Therefore, we are not affected by the requirements of § 16f ChemG or art. 9 (1) (i) and art. 9 (2) of the Directive 2008/98/EC of 19 November 2008 on waste. An entry in the SCIP Database is therefore not necessary.

Once we have further information we will inform you immediately and coordinate appropriate measures. Due to our broad range of articles and due to the fact that we are depending on the information coming from our suppliers, who also have

to fulfil the information requirements, you will certainly understand that we are not able to give further legally binding statements.

<sup>1</sup> Art. 3 no. 3 REACH: article: means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition

## **REACH implementation in our company**

The expert group „Environment and occupational safety” of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. regularly informs us about proposed substances for the Candidate List, public consultations, new SVHC on the Candidate List<sup>2</sup> and about the relevance of SVHC.

The published information on uses of SVHC show that the products supplied do not contain any of these substances.<sup>3</sup>

<sup>2</sup><http://echa.europa.eu/candidate-list-table> and <http://www.reach-clp-biozid-helpdesk.de/de/REACH/Kandidatenliste/Kandidatenliste.html>

<sup>3</sup><http://echa.europa.eu/web/guest/information-on-chemicals/candidate-list-substances-in-articles-table>

By sending you this information letter to fulfil our information requirements as a „supplier of an article” according to Article 33(1) REACH we are following legal provisions and recommendations of WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.

This statement applies only to the article / articles supplied by us. Modifications of the article / articles within the processing are thereby not covered.

Our article **1.0759EA** and **1.1268EA** contains the following substance of the current candidate list in concentrations above 0.1 % weight by weight (w/w):  
Pb (CAS number: 7439-92-1, EC number: 231-100-4)

We have complied with the legally required notifications to the European Chemicals Agency (ECHA) in accordance with § 16f ChemG.

### Conflict Minerals:

The grades supplied by Zapp Precision Metals GmbH, Germany (Schwerte und Unna) contain none of the “conflict minerals” referenced in Section 1502 of the Frank-Dodd Wall Street Reform and Consumer Protection Act as of the final ruling released August 22<sup>nd</sup>, 2012. Tantalum (Ta), Tin (Sn), Gold (Au) and Tungsten (W) are not used to alloy the materials we sell.

Traces of conflict minerals possibly contained in our products can be found by pure chance. We do not use them deliberately in order to give our products any specific function. Nowadays traces of conflict minerals are sometimes unavoidable because of the high recycling rate of metals.

The Dodd-Frank Act explicitly excludes such cases from the reporting obligations. The conditions for a reporting commitment are stipulated in Sec. 1502. conflict minerals b) (2) (B) Dodd Frank Act: “...conflict minerals are

necessary to the functionality or production of a product manufactured by such person...”

High speed steels and the grades 1.4435PM, 1.4439LN, 1.4542GE, 1.4543GG, 2.4964, 9.9367MG, 9.9440YL, 9.9605 und 20AP contain Tungsten and Tantalum as an alloying element. For the grades our supplier confirms that no Conflict Minerals will be used.

Radioactivity:

Initially, it has been established that radioactivity is inevitably to be found everywhere in nature. In this way our environment exhibits natural and in this form non-hazardous radiation everywhere.

This also applies to steel products without restrictions. We have already taken several measures at an early stage to avoid any contamination above the natural level.

We have been conducting a dialog with our primary material suppliers about the measures they have implemented against the – in particular radioactive – contamination of their products.

We have received confirmation from our suppliers in this regard that their products conform to the pertinent legal regulations and that these products are within admissible limits, particularly with regard to radioactivity.

We also confirm that the materials supplied are free of artificial radioactivity.

POPs / Bisphenol A / Phtalate / PAH Ingredients:

These substances are organic compounds. They are not an alloying element and no component in steel making. They cannot exist in steel.

PFOS / PFOA / Silicones / Halogens / Latex / Substances / tissues of animal origin:

This substance is not an alloying element and no component in steel making. It cannot exist in steel.

For any further questions do not hesitate to contact us.

Best regards



**Dr.-Ing. Wolfgang Püttgen**

Quality Management Representative of the Zapp Group