

November 14, 2019

Dear Customer,

On July 16, 2019, ECHA published an updated the Candidate List of Substances of Very High Concern (SVHC) under REACH with the addition of four(4) new substances (not used in the manufacture of brass), bringing the total to 201 substances. This REACH declaration is based upon 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.

However, the June 27, 2018 update included lead metal based on its harmonized hazard classification as Toxic to Reproduction (Category 1A). According to the ECHA Guidelines, suppliers of copper alloys containing lead above 0.3% are recommended to indicate that lead is a Candidate Listed SVHC in applicable alloy Safety Data Sheet information. In addition, suppliers of articles, which contain lead in a concentration above 0.1%, have to provide enough sufficient information to allow safe use of the article to the recipients of the article.

Due to the presence of lead, Chase Brass requires that any customers using our products and alloys review our alloy chemistries disclosed within the Chase Brass Safety Data Sheets (“SDS”) and determine the applicability of the labelling requirements to products or components manufactured from those alloys. Applicable SDS documents are available on our company web page ([www.chasebrass.com](http://www.chasebrass.com)) under the *Quality / Certification SDS Sheets tab*.

The diagram and table on the following pages shows the example for our type of products in Appendix 4, pages 78 - 82 of the European Chemicals Agency document “Guidance on Requirements for Substances in Articles” (June 2017; Version 4.0). Using this as a guide for our brass rod process, the product we ship you falls under the “Extrusion Profile” box in the articles section of the process flow diagram. Since REACH requires registration only for substances and mixtures, we have no registration plans at this time.

Jack Horner, Manager, Quality  
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## Exemplified supply chain of copper metal and copper powder

