

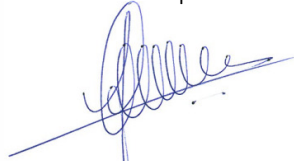
REACH Declaration

STAF has reviewed the current Registration of Chemicals EG1907/2006 REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) legislation and its applicability to the products imported, stocked and distributed for sale.

- Stafa is aware of the REACH regulation and will continuously and closely follow the developments in this field (as far as to apply).
- As a Distributor and / or importer of Fasteners an Obligation for registration according the REACH regulation is not Applicable to STAF. Neither is an Obligation for notification according to Art. 7 (2) of REACH applicable to Stafa. According to Art. 3 of REACH regulation, fasteners are defined as "articles". "Articles" are objects which function is determined to a greater degree by their shape, surface and design than their chemical composition. Articles are exempt from REACH unless they contain any Substances of Very High Concern (SVHC) exceeding 0.1% by weight. For Fasteners, in general, SVHC are significantly lower than 0,1%.
- Additionally the materials distributed and sold by STAF are not intended to release any 'SVCH listed' substances during normal use or reasonably foreseeable conditions of use. As a result of this determination; the products distributed by STAF are not considered to be applicable to the Registration or Authorization Requirements of REACH.
- Up to now no information is available to us, that substances of very high concern with a concentration of more than 0,1 % (weight) according to the Candidate List appear in the products delivered by us.
- According Art. 33 of REACH, there is an obligation to inform customers about substances of very high concern in products if their concentration is more than 0,1% (weight). We require from our non-EU suppliers to inform us about products with substances of very high concern with a concentration of more than 0,1% (weight) according to the latest version of the Candidate List.
- Number of substances on the Candidate List: 209 (last check: July the 1th 2020) <http://echa.europa.eu/web/guest/candidate-list-table>
- STAF shall process future announcements of their suppliers which effect this REACH Regulation directly into this Declaration. Should we find that any product we supply contains an SVHC (Substance of Very High Concern), we will advise our customers within the legal timeframe.
- STAF will remain active to guarantee the safety of people and the environment.

More information on this subject can be found on the attached document

Stafa Group



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Attachment: EU regulation EC 1907/2006 REACH: Obligations for Fasteners

The REACH regulation concerning chemicals, has come into effect since June 01, 2007. REACH distinguishes between substances, preparations and articles, with several obligations.

According to Art. 3 of REACH regulation, fasteners are defined as "articles". "Articles" are objects which function is determined to a greater degree by their shape and design than does their chemical composition.

Obligation for registration and reporting at ECHA (European Chemicals Agency) Article 7(1) 1 of REACH regulation, determines there is an obligation for registration of articles only if they contain substances that are intended to be released under normal or reasonably foreseeable conditions of use and if they contain these substances in access of 1 ton per year and per producer resp. importer. In general, this is not applicable to fasteners.

Even fasteners with a coating system that protects against corrosion through self-sacrificing, have no obligation for registration. Reason is that not the substances itself would be set free, but its reaction products. This exemption is documented in Art. 2, par. 7(b) and Annex V,(3) of REACH regulation. Substances which result from a chemical reaction occurring upon end use and which are not themselves manufactured, imported or placed on the market, are exempted.

Apart from the above, Art. 7(2) of REACH imposes rules for notification if articles contain a substance of very high concern (Art.57) according to the Candidate List (Art. 59 of REACH regulation) if the concentration is over 0,1 % (w/w) and if the total weight of this substance (not of the articles) is more than one ton per importer/producer and per year.

For fasteners, in general the above mentioned obligation for notification is not applicable, as the percentage of substances of very high concern is significantly lower than 0,1%. In some exceptions, this has to be controlled.

Chemo-technical products (e.g. aerosols, glues, seals) are not articles, but preparations. For "preparations" its chemical components are obliged to be registered. For preparations imported into the EU it is the importer that has the obligation for registration, according to Art. 6 of REACH regulation, if more than one ton is imported per year. If preparations are produced in the EU, the producer has the obligation for registration.

Obligations in the supply chain

Traded articles can be subject to reporting or information duties, independent if they are procured within or outside the EU.

For all articles that contain substances of very high concern according to the Candidate List with a threshold of more than 0,1% (weight), Art. 33 of REACH regulation imposes the obligation to inform the supply chain automatically about the substances of very high concern according to the latest edition of the Candidate List. Accordingly the supplier has the obligation to provide the recipient of the articles with the available information on the safe use of the article, at least with the name of the substance.

Amongst others, the substance „Chrome trioxide“ (Chrome(VI)oxide) is on the Candidate List. This substance appears in yellow, black and olive colored passivation layers and also in the zinc flake coating Dacromet, however in a concentration well below 0,1 % of the product weight. Therefore no obligation for information to downstream users is imposed.

This is to be distinguished from the obligations by ROHS directive or ELV that impose maximum thresholds for some substances in articles that are placed on the market. Only with the delivery of substances or preparations it can be required to provide a safety data sheet according to Art. 31 of REACH or information according to Art. 32 of REACH.

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