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Information on SVHCs

Article 33 of the EU Chemicals Regulation (1907/2006, REACH) requires every participant in the supply chain to pass on information on any substances of very high concern (SVHCs) that are present in its products at a concentration of more than 0.1% weight by weight (w/w).

Unless exempt, manufacturers and importers are obligated to arrange for the registration of substances they produce themselves as well as those they import if they place more than one metric ton of the substance on the market every year.

Under the REACH Regulation, it is the chemical substances themselves, not the finished products, that need to be registered. As a manufacturer of cable glands and accessories, we see ourselves as a traditional downstream user.

None of the products we supply require registration as defined by the Regulation. As regards registering and maintaining conformity of the raw materials used, we are in constant contact with our suppliers and distribution partners, who assure us that they comply with all their REACH obligations in this regard.

As far as we are currently aware, lead is the only substance in the most recently published list that is present in our products at a concentration of more than 0.1% w/w. The raw materials used in our brass products contain 4% lead to aid their machinability.

The Member States Committee (MSC) of the European Chemicals Agency (ECHA) has decided to include lead in the **SVHC Candidate List**.

This means that information obligations under the REACH Regulation enter into force with immediate effect. Suppliers of brass products that contain more than 0.1% w/w lead are required to notify their business partners of the lead content when the product is delivered for the first time.

Whether applications for brass alloys containing lead will face further restrictions as the REACH process progresses, such as needing a license for specific purposes of use, will require in-depth consultation and it is unlikely that the question will be answered before 2020.

Even if it is decided that lead requires registration, there will be a transitional period until 2024. We are assuming that the requisite licenses would be issued by the ECHA, especially since the brasses used in machining that contain lead cannot automatically be substituted using current technology.

We are monitoring developments with the REACH Regulation closely and will apply the necessary stipulations to our products.

Sincerely yours

Jacob GmbH

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Amtsgericht Stuttgart HRB 261285
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Kreissparkasse Waiblingen
Deutsche Bank Waiblingen
Commerzbank Stuttgart
Volksbank Stuttgart eG
BW Bank Stuttgart
Postbank Stuttgart

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DE9860270073082667700
DE2760080000321173300
DE46600901001181390001
DE31600501010002907170
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