

August 12, 2015

Finkelstein Metals REACH Declaration

Finkelstein Metals Ltd. is a manufacturer of continuous cast alloys and extrusion alloys.

Under the REACH Regulation¹, Finkelstein Metals' products are defined as "articles" (alloys).

According to the REACH Regulation, articles are subjected to the requirements related to "substances in articles", namely: registration, notification and the duty to communicate information throughout the company supply chains (as defined in Articles 7 & 33 of the regulation).

As the company's articles do not contain substances that are intended to be released under normal or reasonably foreseeable conditions of use, these articles are not subjected to the registration obligation (alloys are considered as "special preparation" and therefore not subjected to registration and evaluation under REACH at their solid state²).

Finkelstein Metals is aware of the notification requirement and of the updated SVHC³ list; in case that a SVHC is present, companies have the obligation of notifying to ECHA if required and/or provide all the customers with data regarding substances contained in its products, in order to allow their safe use (Articles 7, 33).

To Finkelstein Metals' best knowledge, no foreign substance, which is not a part of the raw materials of the alloys, is included in the SVHC list in a concentration above 0.1% w/w, in the Authorization List, and/or in the List of restrictions.

Moreover, after a thorough examination of all the components of the alloys, no SVHC material was detected in a concentration above 0.1% w/w, thus no further action is needed.

¹ REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

http://www.reachonline.eu/REACH/EN/REACH_EN/kw-alloys.html ²

³ SVHC: Substance of Very High Concern classified as carcinogenic, mutagenic or toxic for reproduction category 1 or 2, persistent, bio-accumulative and toxic (according to Article 57 criteria of the REACH Regulation).

Furthermore, none of the components is included of the Authorization List⁴ (Annex XIV).

In addition, none of the components is restricted by the List of Restrictions⁵ (Annex XVII) regarding its current use.

In order to ensure proper implementation of the REACH regulation and to allow the company's trade continuity within the EU countries, Finkelstein Metals has established a professional and a dedicated team to examine the obligations of its products and substances according to the REACH rules. Nevertheless, Finkelstein Metals is willing to provide all EU importers with relevant and accurate data regarding the substances contained within the exported products.

Finkelstein Metals will continue to keep up to date with the evolving REACH regulation and make sure it fully meets the requirements.

Yours sincerely,


Pini Peker
Quality Control Manager

⁴ After a two-step regulatory process, SVHCs may be included in the Authorization List and become subject to authorization. These substances cannot be placed on the market or used after a given date, unless an authorization is granted for their specific use, or the use is exempted from authorization.

⁵ The list of restrictions contains those substances (on its own, in a mixture or in an article) for which manufacture, placing on the market or use is limited or banned in the European Union.