

To the Management of our customers

Radevormwald, 2020-07-28

**REACH Regulation - (EC) No. 1907/2006
Preregistration/registration, intended uses and exposure scenarios, SVHC –
articles and packaging, Annex XIV, Annex XVII, articles with intended release of
substances**

Ladies and Gentlemen,

Every day we receive a multitude of REACH-questionnaires regarding to our products, therefore we decided to answer by way of this standard letter and not to make any detailed article specific declaration to each request.

We are coordinating all REACH activities centrally. So this letter is sent to you from our central sales organization on behalf of all GKN locations.

We would like to inform you on the current status of the REACH implementations at GKN Sinter Metals for all European production sites. The following statements are related to all of the different products from these locations.

Registration:

GKN Sinter Metals is a producer and supplier of articles (per Article 3 No. 3) and is in terms of REACH according to Article 3 No13 a Downstream User. Consequently, GKN Sinter Metals has no obligation of registration. We have informed all suppliers of concern about the use of their products in the powder metal technology. In this context we have advised them of the necessity of registration and their responsibility in the supply chain. We are now depending on their proceeding with the process.

For supervision and confirmation, we do a periodical review of our suppliers. Although their responses are not yet complete, we can state today that we do not fear any delivery bottleneck caused by missing preregistration/registration. There will be, however, a possibility due to REACH that a limited number of special formulations (additives or auxiliary substances) might no longer be offered due to potential raw material restrictions. In those cases, we have alternatives available.

Where our suppliers have given their statements as a letter of intention this is not legally binding. We are sure you will understand that we ourselves cannot sign a legally binding document on such a basis.

Intended Uses and Exposure Scenarios:

In connection with the registration processes, which will take place during the next years, the “Intended Uses” and “Exposures Scenarios” of chemical substances must be developed. We are working on these scenarios in close cooperation with the European Powder Metallurgy Association (EPMA). Therefore, to a large extent we will have a uniform description of our technology (transformation of powders to parts). We will communicate this along the supply chain accordingly.

SVHC – articles and packaging:

A new official candidate list of “Substances of Very High Concern” (SVHC) has been published on the website of the European Chemicals Agency on 2020-06-25. (<http://echa.europa.eu/web/guest/candidate-list-table>).

According to article 33, paragraph 1, it is our obligation to communicate to our customers the presence of SVHC candidates in our articles.

Based on our analysis none of our articles contains substances from the actual candidate list as part of our recipe list. In case that any of the additives or auxiliary substances would contain SVHC constituents, they would occur in our articles below the limit of 0.1 % weight by weight, as mentioned in the regulation, unless we communicated different directly to you.

The definition for article is in accordance with the decision of the European Court of Justice on September 10, 2015: “Once an article, always an article”.

Thus you now have all needed information available concerning substances as listed in the SVHC candidate list related to our articles.

According to information available to us and according to our own investigations we are working on the basis that the packaging of our products also does not contain any of the substances included in the candidate list in a concentration above 0.1 % weight by weight. Should we receive contrary information – which we do not expect – we will advise you immediately.

Annex XIV

If our articles contain substances, which are listed in Annex XIV which require authorisation according to regulation (EU) No 143/2011 we will strive for a qualitatively equivalent substitution or for authorisation taking in account our specific use. Unless you have not been different advised, the articles supplied to you do not contain substances of the actual relevant version of Annex XIV.

Annex XVII

Annex XVII of the REACH regulation lists substances with restrictions on the manufacture, placing on market and use of certain dangerous substances, preparations and articles. We would like to inform you that our articles do not contain any listed substance above the allowed threshold limit and that we comply with the restrictions on uses.

Registration and notification of substances intended to be released from articles

Oil impregnated gears contain substances with intended (“under normal or reasonably foreseeable conditions of use” according to article 7 paragraph 1) release. In terms of registration requirements, we make sure that a supplier further up our supply chain fulfils the registration requirements in consideration to our own uses.

GKN Sinter Metals is a responsibly acting company particularly in terms of all REACH belongings and is interested in a cooperative business relationship together with you as our customer.

For any further questions please send a note to: reach@gkn.com

Yours sincerely

GKN Sinter Metals Engineering GmbH



Karl Friedrich Roth
Managing Director



ppa.
Dr. Nils Bornemann
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Important advice:

The preceding declaration is based on the available information to date. This declaration is not legally binding. GKN Sinter Metals makes this declaration in good faith but does not give any warranty in terms of completeness and correctness. GKN Sinter Metals assumes no liability for claims that result out of good confidence in this declaration.