

To the Management of our customers

Radevormwald, 2022-01-05

**European REACH Regulation - (EC) No. 1907/2006  
Registration, intended uses and exposure scenarios, SVHC; Annex XIV; Annex XVII**

Ladies and Gentlemen,

Every day we receive a multitude of REACH-questionnaires regarding 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, therefore 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 **Non-European** production sites. The following statements are related to all different products of these locations.

However, we would like to make you aware that our company – as a non-EU based supplier to the EU – has no legal obligation to meet European regulations, such as REACH requirements. Since the protection of Health and Environment is one of our main goals, however, we would like to inform you – as one of our European customers – about our current REACH-measures & activities.

**Registration:**

GKN Sinter Metals as producers of articles outside of Europe has no obligation of registration of any of our products according to the REACH directive. For your information: We are supplied by non-EU companies, but also by EU based companies with pre-materials, which we convert to articles. In the latter case, these pre-materials will be registered (in the supply chain) in Europe. The follow-up is done by our EU operations.

**Intended Uses and Exposure Scenarios:**

There is no obligation for non EU suppliers of articles to evaluate the intended uses and describe the exposure scenarios, which has to take place in connection with the registration processes in Europe, during the next years. Our EU operations are working on these scenarios in close cooperation with the European Powder Metallurgy Association (EPMA). Therefore, they will be a uniform description of our technology (transformation of powders into parts) to a large extent. If you need any support related to our products in this direction, we are prepared to deliver it.

### **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 2021-07-08. (<http://echa.europa.eu/web/guest/candidate-list-table>)

According to article 33, paragraph 1, the EU-supplier of an article has the obligation to communicate the presence of SVHC candidates in his articles to the customer. We as Non-EU-supplier are generally not obliged with this information duty. Nevertheless we are following the developments of the candidate list very closely.

### **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 even though we as a Non-EU-Supplier are not directly obliged with the REACH-authorisation process.

### **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 are aware of the restrictions on uses.

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

For any questions, please contact GKN Sinter Metal Key Account Manager.

Yours sincerely

**GKN Sinter Metals Engineering GmbH**



Elmar Auer  
Senior VP Manufacturing  
Engineering & Head of Sustainability  
GKN Powder Metallurgy



Laura Fetic  
Global Senior Director HSE,  
GKN Powder Metallurgy

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.