

GRUPPO LUCEFIN

The Lucefin Group
includes
the following
companies

ACCIAI BRIANZA Desio (MB)

TRAFILIX Esine (BS)

TRE VALLI ACCIAI Berzo Inferiore (BS)

CO.MET. ACCIAI Brescia

TRAFITEC S. Colombano al Lambro (MI)

COSMO ACCIAI Spilamberto (MO)

TRAFIL CZECH Kladno, CZ

NUOVA BASSANI Forlì (FC)

SIDERCONERO Osimo Stazione (AN)

SIDERMARCA Ponzano Veneto (TV)

TRA.ME.T. Orbassano (TO)

KSM STAHL Empfingen, D

OFFICIAL POSITION OF THE LUCEFIN GROUP ON THE EUROPEAN REGULATION REACH (CE 1907/2006)

07/16/2019

The a.m. companies produce and/or distribute cold-drawn, peeled, ground, hot-rolled, forged steel bars as well as cut-to-length forged steel blocks. On request, some steel bars are protected with an antirust protection oil. Our position concerning the applicability of the "Regulation" to our activities is the following:

- 1) The a.m. "Regulation" is applicable to producers, importers and final users of chemical substances (Section 1, Par. 1, Art. 1, Sub 3 of the EC Regulation no. 1907/2006)
- 2) FINAL USERS, producers of objects whose shape, surface and design determine the use of products in relation to their chemical composition are called PRODUCERS OF ARTICLES (Section 1, Par. 2, Art. 3, Sub 3 of the EC Regulation no. 1907/2006)
- 3) Every producer or importer of ARTICLES has the obligation to register whenever
 - a. The quantity of the substance contained in such articles is higher than 1 Ton/year
 - b. The substance can be released under normal or foreseeable conditions of use (Section 2, Par. 1, Art. 7, Sub 1, letters a+b)

As clearly stated in point 3) above and in article 7 section 2.b of the EC Regulation 1907/06 (all harmful substances for men and the environment are totally absent or present in a percentage $\leq 0.1\%$ in weight), we hereby declare that all products supplied by the Lucefin Group are considered exempt from any registration obligation.

A further exemption from the registration obligation for the companies belonging to the Lucefin Group is contained in the Attachment V of the "Regulation".

Please note that in June 27th, 2018 ECHA has included LEAD in the Candidate list (SVHC), that is the list of the candidate substances for inclusion in Annex XIV (authorisation) of Reach.

Pursuant to art. 33 of REACH Reg., we inform you that lead concentration in free cutting and lead added steels exceeds 0,1% of weight. The informative "Update SVHC of 06/27/2018" is available on our website: it reports indications to grant safe use of product sold. None of the other substances contained in the Candidate List 07/16/2019 are contained in our products.

We will keep observing the List updatings to inform you about any development relevant to our production.

We will seek from our suppliers of chemical substances (for instance, protection oil for drawing) all necessary information such as: number of registration, authorizations, restrictions, updated safety data sheets in compliance with the "Regulation".

The Lucefin Group

