



February 12, 2018

Subject: EU REACH Regulation (EC 1907/2006)

The uncoated strip stainless steel, nickel alloys, titanium, niobium and zirconium manufactured at Ulbrich Stainless Steels and Special Metals are in the form of coils, which are classified as “finished” products in accordance with the REACH guidance documentation. These products are classified as “articles” which do not contain “substances” intended for release. In accordance with the REACH regulations, products classified as “articles” are not required to register their constituent “substances” (nor pre-register). In particular, Article 3 of REACH defines an “article” as: “An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition”. Therefore, it is Ulbrich’s opinion that there are no registration requirements for the uncoated metal under REACH.

In addition, these materials do not contain any of the Substances of Very High Concern published on January 15, 2018 in amounts at or exceeding the regulated concentrations. This list of substances triggers notification requirements for articles if certain criteria are met, primarily the substance being present in the article at a concentration greater than 0.1%. USSM has reviewed this list and concluded none of these chemicals are present in the uncoated metal produced at our mill in concentrations equal to or greater than 0.1% of the total product weight.

If you purchase coated or other materials not covered by this letter, please contact your Ulbrich Salesperson for additional information concerning the specific coating, etc.

Sincerely,

Debra DeFelice

Debra DeFelice
Environmental, Health and Safety Manager
Ulbrich Stainless Steels and Special Metals, Inc.