



**We Deliver Precision®**

**ULBRICH STAINLESS STEELS & SPECIAL METALS, INC.**

November 21, 2019

Subject: EU REACH Regulation (EC 1907/2006)

The uncoated stainless steel, nickel alloys, titanium, niobium and zirconium manufactured at Ulbrich Specialty Strip Mill, Ulbrich of Illinois and Ulbrich of California 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 July 16, 2019 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.

We also continue to monitor the ongoing amendments to Annex XVII of REACH. While these amendments introduced some new restrictions they primarily replaced a number of European Union directives by consolidating existing restrictions, including those that had been implemented as amendments to Directive 76/769/EEC. We have determined that our products are compliant with Annex XVII restrictions. We will continue to monitor new additions to Annex XVII and will update our compliance statement as appropriate.

If you purchase coated coils, please contact the Ulbrich site for information on the specific coating.

Sincerely,

*Debra DeFelice*

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