



STABILIMENTO DI BRESCIA E DOMICILIO FISCALE
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Società con socio unico
LEGAL HEADQUARTERS: CORSO GARIBALDI, 49
20121 MILANO ITALY
REG. IMP. Di MILANO N.07617260158
COD. FISC. E PART. IVA: IT 07617260158
CAPITALE SOCIALE €. 20.000.000,00 INT. VERS.
N. MECC. MI 018636 – C.C.I.A.A. MILANO N. 1170974

Brescia, 15/01/2019

Dear **ORI MARTIN S.p.A. CUSTOMERS**

Attn: **Quality Manager**
Health & Safety and Environment Manager
REACH Representative

Object: **Statement of Compliance with “REACH” Regulation (EC) n° 1907/2006**

With regard to the content of Regulation (EC) n° 1907/2006, and following amendments and integrations, this letter concerns the registration, evaluation, authorisation and restriction of chemicals (REACH), subsequently called “REACH Regulation”. We would like to hereby highlight the following points:

1) Product Classification

According to the classification foreseen by the REACH Regulation (chemical, mixture or item), the products we supply (steel billets, wire rod coils and bars) are considered ITEMS without intended chemical emissions; these do not require registration in accordance with article 7.

2) Obligations for O.R.I. MARTIN S.p.A.

REACH Regulation does not require the registration of chemicals originating from metal scraps, if these come from EU countries, or if these are purchased from third countries as waste. Considering that all kind of scrap we use fall into these categories, we were not required to proceed with any registration (exemption as per **art. 2, par. 7, letter d** of “REACH” Regulation (EC) n° 1907/2006).

3) Obligations for our Supply Chain

We purchase other raw materials used during our production process (eg. alloys, pig iron) from producers or importers with their headquarters in the European Union. We have asked them to provide Statements of Compliance with REACH Regulation, as suppliers of chemicals and mixtures.

4) Use Restrictions for Certain Chemicals (Annex XVII)

We would like to inform you that O.R.I. MARTIN S.p.A.’s products, except for those mentioned at Point 1 below (conditions for restriction), do not fall under the category of products under use restrictions, as per art. 67, and as per the list included in Annex XVII of the REACH Regulation.

Point 1: nickel (restriction n. 27) – Do not use steels alloyed with nickel (Ni) (EINECS 231-111-4) for the purposes highlighted in Annex XVII (such as: the production of metal objects/items intended for direct and extended contact with skin, such as earrings, bracelets etc.).





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O.R.I. MARTIN
ACCIAIERIA E FERRIERA DI BRESCIA S.P.A.

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5) “SVHC” Chemicals

Chemicals that fulfil the criteria listed in art. 57 and identified as complying with art. 59 of the REACH Regulation, are high-risk chemicals also known as SVHC (Substances at Very High Concern). Considering that:

- according to statements received from our suppliers, such chemicals are not intentionally added to chemicals/mixtures purchased by us;
- these chemicals are not added intentionally by us during the production process;
- traces do not exceed a concentration of 0,1% p/p;

ORI MARTIN S.p.A. declares that its articles do not contain highly concerning chemicals (SVHC) included in the latest candidate list of chemicals, due to be included in Annex XIV, **at a concentration surpassing 0,1% p/p.**

As a consequence, the requirements for delayed communication (art. 33, par. 1) and notification to ECHA (art. 7, par. 2, letter b), foreseen by REACH Regulation, do not apply.

Our products' safety information sheet shows traces of some SVHC, at a concentration that does not surpass 0,01% p/p, and which therefore makes the obligations mentioned above not applicable.

Updates on the inclusion of certain chemicals in the “Candidate List of SVHC”, or variations received from our suppliers, or pertaining to our products, will be object of immediate communication from our part.

The above statement applies to the chemicals listed on the “Candidate List of SVHC” currently published on ECHA’s website (www.echa.europa.eu).

Please do not hesitate to contact us if you would like more information.

Yours sincerely,

O.R.I. MARTIN S.p.A.
Health & Safety Manager



Mr. Mauro Bellagente