



August 2020

COMPLIANCE STATEMENT – STEELSCAPE, LLC (“Steelscape”)

RESTRICTION EVALUATION AUTHORIZATION of CHEMICALS (“REACH”) Regulation (EC) 1907/2006

Steelscape produces a range of metal coated products including TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 exported to Europe from its mills.

The information in this statement is correct as of the date above. Steelscape will continue to monitor any changes to the Candidate List of Substances of Very High Concern for Authorisation and update its documents and communications accordingly.

Product Classification - ARTICLES

Steelscape has interpreted the information currently available including the definition of Articles in the REACH regulation, and concluded that TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products will be classified as **Articles** under REACH.

“**Articles**” is defined as an object that during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition.

Article 7(1) Registration of substances in articles

Article 7(1) of REACH provides the circumstances upon which a registration of substances in articles is required.

A registration of substances in articles is obligatory for an article producer or importer only if the following conditions are met:

- the substances are intended to be released from the produced or imported article(s) during normal and reasonable foreseeable conditions of use; and
- the total amount of the substance present in the articles with intended releases produced and/or imported by that actor exceeds 1 tonne per year per producer or importer.

Steelscape has interpreted the information currently available and concluded that TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products are articles with no substances intended for release.

Article 7(1) is therefore not applicable to Steelscape TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products and registration of substances in articles is not required.

Article 7(2) Notification of substances in articles

Article 7(2) of REACH provides the circumstances upon which a notification of substances in articles is required.

Notification of substances in articles is required when all conditions are met:

- The substance is included in the candidate list for authorisation (Article 59 (1)); and
- the substance is present in all articles produced or imported by one actor in an amount totalling over 1 tonne per year (per producer or importer); and
- the substance is present in articles above a concentration of 0.1% weight by weight (w/w)

The Candidate List of Substances of Very High Concern for Authorisation contains no substances known to be present in Steelscape TruZinc® Steel, TruZinc® Plus Steel, or TruZinc® Steel with Passerite 6010 products exported to Europe.

Article 7(2) is therefore not applicable to Steelscape TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products and notification of substances in articles is not required.

Article 33 Communication of Information on substances in articles

Article 33 of the regulations: Communication of Information on a substance in articles is mandatory if the substance is included in the candidate list of substances for authorization in a concentration above 0.1% (w/w). This information allows the safe use of the article containing a substance from the candidate list of substances for authorization. The information must be given to industrial or professional users and distributors. The information must also be provided to consumers within 45 days after being requested.

The Candidate List of Substances of Very High Concern for Authorization contains no substances known to be present in Steelscape TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products exported to Europe.

Article 33 is therefore not applicable to TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products and communication of information on substances in articles is not required.

All Steelscape TruZinc® Steel, TruZinc® Plus Steel, and TruZinc® Steel with Passerite 6010 products exported to Europe comply with REACH regulation (EC) 1907/2006.