

To whom may it concern.

REACH steel semiproducts or products declaration

Steel semiproducts (from casting) /products are considered as **articles** according to art. 3 on the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006, **concerning the registration, evaluation, authorization and restriction of chemicals (REACH), as ECHA recognizes in the letter addressed** to Eurofer (European Steel Association) on September 2, 2009

<http://www.eurofer.org/web03/Issues&Positions/REACH/Reply%20ECHA%20on%20EUROFER%20letter.%20%20September%202009.pdf>

Therefore, they are **NOT submitted to any registration requirements.**

Furthermore, the steel (articles) produced by Acería de Alava, S.A.U. and Tubacex Tubos Inoxidables, S.A.U. do not contain substances which intention was its liberation or that would liberate during their reasonable use, as indicated on art. 7 of the regulation.

Similarly, our articles have been neither added nor contain, substances over the declaration thresholds (>0.1% in weight):

- which are submitted to authorizations according to annex XIV
- which are included on the candidate lists to the authorization process
- which are on the discussion lists of substances of very high concern (SVHC):

<http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/authorisation-list>
<http://echa.europa.eu/es/candidate-list-table>
<http://echa.europa.eu/addressing-chemicals-of-concern/authorisation/substances-of-very-high-concern-identification>

Consequently in a medium term any, it is neither needed nor expected to need notification upon the substances within the steel Acería de Alava, S.A.U. and Tubacex Tubos Inoxidables, S.A.U. provides.

In Llodio, January, 2019



Signed on behalf of Acería de Alava, S.A.U. and Tubacex Tubos Inoxidables, S.A.U.
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