



phoenix tube company, inc.

Manufacturer of Stainless Ornamental and Structural Tubing

August 26, 2020

Phoenix Tube Co., Inc

1185 Win Drive

Bethlehem, PA 18017

Re: DECLARATION OF **EC REACH** COMPLIANCE

Regulation (EC) No. 1907/2007 of the European Parliament and of The Counsel of 01 June 2007 concerning the: Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) applies to all Articles ("Products") imported into the European Union.

An amended list was published listing all Substances of Very High Concern (SVHC) which are subject to restriction as to their import into the European Union. The list was published on the European Chemicals Agency (ECHA) website since 1996 and amended as recently as 6/25/2020.

The following guarantees can be made:

1. Phoenix Tube has reviewed the list and cannot find any substance listed that would be a part of our Product of Stainless Steel Pipe, Tube and Bar. Hence, we are in compliance with the most recent SVHC list.
2. We monitor our suppliers for SVHC list substances used in the manufacture of Raw Material Products to ensure compliance with EC REACH. Our Raw Material suppliers are on record for not using any of the SVHC list substances.

Sincerely,

Charles H Kissinger

Engineering Manager

Phoenix Tube Co., Inc



NORTH AMERICAN STAINLESS



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July 13, 2020

RE: REACH Conformity

On June 1, 2007, major new legislation entered into force in the European Union ("EU"), dramatically overhauling the system for regulating chemicals, including chemicals in mixtures and articles, that are manufactured or imported into Europe. Known as "REACH" – the Registration, Evaluation, and Authorization of Chemicals – the legislation imposes substantial requirements on companies to register and provide health risk information on chemicals manufactured in Europe or imported in excess of one metric ton per year. In essence, the regulatory system requires chemical manufacturers and importers to prove the safety of a substance before being allowed to place it on the market. The list of restricted substances is update periodically. The most recent amended list was published on the European Chemicals Agency (ECHA) website and amended for inclusion on June 25, 2020.

NAS has studied the products and substances contained in and can confirm that our product does not contain substances of the following categories:

- Carcinogenic, mutagenic or toxic to reproduction, category 1
- Persistent, bioaccumulative and toxic
- Very persistent and very bioaccumulative
- Substances of Very High Concern (SVHC) included in the ECHA (European Chemicals Agency) Candidate List in a concentration above 0.1% by weight

Stainless steel is currently classified as an article. NAS's stainless steel does contain SVHCs below the 0.1% by weight threshold, and these SVHCs are not intended to be released. As such, stainless steel does not currently have to be registered.

Nickel is listed on Annex XVII. Attached are the restriction that applies for nickel, and the Safety Information Sheet as used in EU by our parent company.

Information about the safe use of products is available to our customers. The Safety Data Sheet is available on our website. NAS continues to review material safety data sheets (and Safety Information Sheets) for materials used at NAS as means of REACH conformity.

Sincerely,

A handwritten signature in black ink, appearing to read "Maria Eichelberger", written in a cursive style.

Maria Eichelberger
Environmental Manager
North American Stainless