To our customers  
Fridolfin, 03.02.2021  

Information regarding Regulation (EC) No 1907/2006 (REACH) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals

Regulation (EC) No 1907/2006 (REACH) sets different requirements for the actors in the supply chain. Rosenberger is a manufacturer of articles and does not produce chemical substances or mixtures. Thus, Rosenberger is a so called “downstream user” in the sense of the Regulation (Art. 3, 13). As such Rosenberger has neither the duty nor the possibility to register substances. This was done by our supplies as far as necessary.

Annex XIV of the regulation lists the substances that may only be used when authorisation was granted. Before a substance is added to annex XIV it is taken up in the so called “candidate list” and thus identified as “substance of very high concern” (SVHC). The candidate list is available here: https://echa.europa.eu/de/candidate-list-table

It is very important to notice that SVHC can still be used without restriction. Between the uptake of a substance in annex XIV and the start of the authorisation requirement (so called “Sunset Date”) a transition period of several years exist.

For articles that contain a SVHC above 0.1% w/w the duty to communicate information according to article 33 applies. Every supplier of such an article must provide the recipient at least with the name of the substance as long as no other information necessary for safe use are available to the supplier.

On 27th June 2018 lead (CAS 7439-92-1) was added to the REACH candidate list. This SVHC is contained above 0.1% w/w in all Rosenberger articles for which RoHS exemption 6c or ELV exemption 3 is applied. Products can be checked on the presence of SVHC here: https://www.rosenberger.com/en/company/quality/compliance.php

Further information is available from: product.compliance@rosenberger.com

To the actual knowledge and based on information from the suppliers no article of Rosenberger contains substances listed in REACH Annex XIV and Annex XVII above the threshold defined in these annexes.

I. V. Dr. Michael Müller  
(Product Compliance)

1 For customers that receive IMDS data, Article 33 is fulfilled via them.