



SINTEC s.r.l.  
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Azienda con Sistema di gestione  
Qualità UNI EN ISO 9001:2015  
Certificato Nr. 50 100 12741



Caronno Pertusella, 2018-02-06

To all our Customers

**REACH Regulation - (EC) No. 1907/2006**  
**Registration, intended uses and exposure scenarios, SVHC, Annex XIV, Annex XVII**

Dear Customers,

we are receiving many REACH questionnaires regarding our products and we decided to answer with this standard letter and we don't make any detailed specific declaration to each request.

With this letter you will be informed on the current status of the REACH implementations at SINTEC. The following statements are related to all of the different products from our plant.

**Registration:**

SINTEC is a producer and supplier of articles (ARTICLE 2 No. 9) and is in terms of REACH according to Article 2 No 19 a Downstream User. Consequently SINTEC has no obligation of registration. We have informed all suppliers of concern about the use of their products in the powder metal technology. In this context we have advised them of the necessity of registration and their responsibility in the supply chain. We are now depending on their proceeding with the process.

For supervision and confirmation we do a periodical review of our suppliers.

Where our suppliers have given their statements as a letter of intention this is not legally binding. We are sure you will understand that we ourselves cannot sign a legally binding document on such a basis.

**Intended Uses and Exposure Scenarios**

In connection with the registration processes, which will take place during the next years, the "Intended Uses" and "Exposures Scenarios" of chemical substances must be developed. The European Powder Metallurgy Association (EPMA) is working on these scenarios. Therefore, to a large extent we will have a uniform description of our technology. We will communicate this along the supply chain accordingly.



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## **SVHC - articles and packaging:**

A new official candidate list of "Substances of Very High Concern" (SVHC) has been published on the website of the European Chemicals Agency on 2018-01-15.  
(<http://echa.europa.eu/web/guest/candidate-list-table>).

According to article 33, paragraph 1, it is our obligation to communicate to our customers the presence of SVHC candidates in our articles.

**Based on our analysis none of our articles contains substances from the actual candidate list as part of our recipe list. In case that any of the additives or auxiliary substances would contain SVHC constituents, they would occur in our articles below the limit of 0,1% weight by weight, as mentioned in the regulation.**

The definition for article is in accordance with the decision of the European Court of Justice on September 10, 2015: "Once an article, always an article".

**Thus you have now all needed information available concerning substances as listed in the SVHC candidate list related to our articles.**

According to information available to us and according to our own investigations we are working on the basis that the packaging of our products also does not contain any of the substances included in the candidate list in a concentration above 0.1% weight by weight. Should we receive different information, which we do not expect, we will advise you immediately.

## **Annex XIV**

If our articles contain substances, which are listed in Annex XIV which require authorisation according to regulation (EU) No 143/2011 we will do all our efforts for a qualitatively equivalent substitution or for authorisation taking in account our specific use. Our articles do not contain substances of the actual relevant version of Annex XIV.

## **Annex XVII**

Annex XVII of the REACH regulation lists substances with restrictions on the manufacture, placing on market and use of certain dangerous substances, preparations and articles. We would like to



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inform you that our articles do not contain any listed substance above the allowed threshold limit and that we comply with the restrictions on uses.

### **Registration and notification of substances intended to be released from articles**

Oil impregnated bearings contain substances with intended ("under normal or reasonably foreseeable conditions of use" according to article 7 paragraph 1) release. In terms of registration requirements, we make sure that a supplier further up our supply chain fulfils the registration requirements in consideration to our own uses.

For any further questions please send an email to: [sintec@sintecsrl.com](mailto:sintec@sintecsrl.com)

Your sincerely

SINTEC S.r.l

Ing. Lorenzo Mariani  
Managing Director

Ing. Massimiliano Bellesso  
Quality Manager

Important advice:

The proceeding declaration is based on the available information to date. This declaration is not legally binding. SINTEC produced this declaration in good faith but does not give any warranty in terms of completeness and correctness. SINTEC assume no liability for claims that result out of good confidence in this declaration.