

REACH Statement

EU Regulation on REACH (Registration, Evaluation, Authorisation and restriction of Chemicals).

Document Control

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Comments:			
<p>V2.1: Document updated to reflect the following changes:</p> <ul style="list-style-type: none"> - Addition (on 27th June, 2018) of 10 new substances to the list of Substances of Very High Concern (SVHC). - Change of legal entity and corporate ownership, from Caparo to Liberty (now Liberty Merchant Bar). - Updated template. <p>V2.2: Document updated to reflect the following changes:</p> <ul style="list-style-type: none"> - Addition (on 15th January, 2019) of 6 new substances to the list of Substances of Very High Concern (SVHC). <p>V2.2b: Minor alterations.</p> <ul style="list-style-type: none"> - Minor alterations to the title and text, with no changes to the main content, or context of the statement. <p>V2.2c: Document updated to reflect the following changes:</p> <ul style="list-style-type: none"> - Addition (on 16th July, 2019) of 3 new substances to the list of Substances of Very High Concern (SVHC). <p>V2.2d: Document updated to reflect the following changes:</p> <ul style="list-style-type: none"> - Addition (on 16th January, 2020) of 5 new substances to the list of Substances of Very High Concern (SVHC). 			

Liberty Merchant Bar Plc REACH Statement

The European Regulation (EC 1907/2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) requires substances on their own, in preparations, or substances intentionally released from articles, and that are manufactured or imported into the EU in quantities above 1 tonne per year per manufacturer/importer, to be registered.

Liberty Merchant Bar does not manufacture or import substances on their own or in preparations. We do manufacture a range of merchant bar products and purchase / import steel billet which are considered articles. However, these articles have no intended or foreseeable release, as outlined in the European Chemical Agency's *'Guidance on requirements for substances in articles'* (RIP 3.8), and, therefore, we have no registration obligation under REACH.

We are 'downstream users' (i.e. we use a substance, either on its own or in a preparation, in the course of our industrial or professional activities) and recognise that we have certain obligations to satisfy. These include:

- Applying the risk management measures identified by the supplier and communicated a Safety Data Sheet (SDS), passing this information down the supply chain; and
- Making the supplier aware of the use of the substance(s) we purchase so that the supplier can include this 'intended use(s)' in the risk assessment and management information in the SDS.

We have identified the substances that we use in the course of our industrial activities and have engaged with our suppliers to seek formal assurance of their intention to comply with the registration requirements of REACH. Where our supplier is reliant on an actor up the supply chain to register for a substance(s) which they provide to us, we have requested that they qualify their intention to comply with REACH, so that the substance(s) we use will remain available for use in the future.

In January 2020, the European Chemicals Agency (ECHA) published (in accordance with Article 59(10) of the REACH Regulation) an update of the Candidate list of Substances of Very High Concern (SVHC) subject to the authorisation process. A further 5 (five) new Substances were added to the existing list on 16th January, 2020, which was previously updated in July 2019. Article 33 of REACH obliges suppliers of articles containing SVHC in a concentration greater than 0.1% w/w to communicate this information.

Please note that none of the 205 substances in the current SVHC Candidate list are present in a concentration above 0.1% w/w in any of the products we supply. Liberty Merchant Bar will continue to monitor the SVHC Candidate list and update customers and downstream users where relevant.

I trust that this letter provides the necessary assurance that Liberty Merchant Bar fully recognises and is actively engaged in satisfying its REACH obligations. If you would like to discuss any aspect of this letter further please do not hesitate to contact me.

For and behalf of Liberty Merchant Bar Plc.



Jonathan Robinson
SHEQ Manager