



March 25, 2025

RE:

[www.rohsguide.com](http://www.rohsguide.com)

Restriction of Hazardous Substances 2002/95/EC (Jan. 27, 2003)

Recast Directive 2001/65/EU aka RoHS 2 (June 8, 2001)

Revision to Annex II 2015/863 aka RoHS 3 (March 31, 2015)

[www.rohsguide.com/rohs-reach.htm](http://www.rohsguide.com/rohs-reach.htm)

REACH Legislation as per Amended Legislation of April 7, 2020

REACH Annex XIV & Annex XVII as included in Amended Legislation of February 7, 2020

REACH Candidate List Updated 06-25-2020

REACH Candidate List Updated 07-08-2021

REACH Candidate List Updated 01-17-2023

REACH Candidate List Updated 06-14-2023

REACH Candidate List Updated 01-23-2024

REACH Candidate List Updated 01-21-2025

To Whom it May Concern,

The European Union Chemicals Agency has issued various directives that control substances of concern in their RoHS and REACH directives.

The RoHS directive was first implemented in the EU and restricted 6 hazardous substances in electronic components: lead [Pb], hexavalent chromium [Cr-VI], mercury [Hg], polybrominated biphenyls [PBB], polybrominated diphenyl ethers [PBDE] and cadmium [Cd]. The scope of RoHS has expanded to include 4 more chemicals in Europe (DEHP, BBP, DBP, DIBP), but countries outside Europe have adopted only the original 6 substances. (Refer to [www.rohsguide.com](http://www.rohsguide.com) for hazardous substance list and thresholds.)

The REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) regulates chemicals manufactured in or imported into the European Union. REACH requires manufacturers or importers of substances to register them with the central European Chemicals Agency (ECHA). REACH prioritizes Substances of Very High Concern (SVHC) from the Candidate List to determine which substances should be included in the Authorization List Annex XIV. Once a substance is included in the Candidate List, it creates certain legal obligations for the importers, producers and suppliers of an article that contains such a substance. REACH defines an "Article" in Chapter 2, Article 3, as an object which during production is given a special shape, surface or design that determines its function to a greater degree than its chemical composition. An "Article" is usually considered a finished product. Accordingly, the steel products supplied to your company by AM/NS Calvert are considered Articles consistent with REACH definitions and are not considered a "Substance" under the REACH definitions. (Refer to [www.rohsguide.com/rohs-reach.htm](http://www.rohsguide.com/rohs-reach.htm) for list of restricted chemicals

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or <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20210215> for the applicable REACH definitions.)

As of the date of this letter we do not routinely analyze for the presence of these SVHC's because they are not a part of the manufacturing process, add no inherent quality to the products, and are typically, if present, below threshold concentrations:

1. "Lead, Cadmium and Nickel" are inherent in steel as a residual material. Lead may be present in either the steel or the galvanized coating below the 0.1% max (1000 ppm). Cadmium may be present in either the steel or the galvanized coating below the 0.01% max (100 ppm). Mercury, if present, would be below the 0.1% (1000 ppm). Chromium is routinely added to certain steel products, but our manufacturing process prevents the formation of chromium+6 phase in the final product, with the exceptions noted below.
2. Environmentally persistent transformer fluids / flame retardants are not part of the steelmaking process.
3. Likewise, the other chemical compounds noted are also not part of the steelmaking processes.

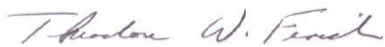
This letter applies to AM/NS Calvert flat rolled products.

The following products are currently compliant:

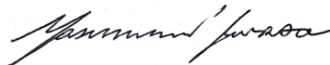
1. Hot Rolled and Cold Rolled Steel Sheet (Dry or oiled)
2. Hot Dipped Galvanized (Dry or oiled)
3. Hot Dipped Galvannealed (Dry or Oiled)
4. Aluminized (Dry or oiled)

Under the REACH guidelines, a North American company that exports product to the European Union cannot register itself. REACH obligations for exporters must be fulfilled by the importers or by a company established in the European Union and nominated as the company's representative. Consequently, the registration with the ECHA of a substance covered by REACH is not ArcelorMittal North America's or AM/NS Calvert's responsibility.

If you have an interest in discussing this information further, please feel free to contact ArcelorMittal NA or AM/NS Calvert representatives noted below.



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