

# EU Declaration of Compliance

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Description:

All JORC Products

We declare that to the best of our knowledge no substances<sup>(1)</sup> currently categorised under EU REACH Regulation (EC) No 1907/2006 as substances of very high concern are used in our production or products, in a concentration above 0,1% weight by weight.

Exception: <sup>(1)</sup> lead is an integral component in brass, see page 2 for more details.

The substances which are at present subject to (pre-)registration are not intended to be released from our products during normal and reasonable foreseeable conditions of use, therefore we are not bound to (pre-)register these substances as an article producer.

Our suppliers have, if needed, (pre-)registered the substances used in their articles to ensure an uninterrupted supply.

Heerlen, 2 March 2022

JORC Industrial BV

Mr. de Bie  
Managing Director



Exception: <sup>(1)</sup> lead in brass components, explained in more detail.

Article 33 of the Regulation (EC) No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) requires every participant in the supply chain to pass on information on any substance of very high concern (SVHCs) that are present in its products at a concentration of more than 0.1% weight by weight (w/w).

Unless exempt, manufacturers and importers are obligated to arrange for the registration of substances they produce themselves as well as those they import if they place more than one metric ton of the substance on the market every year.

Under the REACH Regulation, it is the chemical substances themselves, not the finished products, that need to be registered. As a manufacturer and importer of (brass) articles, we see ourselves as a traditional downstream user and an importer of articles.

None of the products we supply require registration as defined by the Regulation.

As regards to the registering and maintaining conformity of the raw materials used, we are in constant contact with our suppliers, who assure us that they comply with all their REACH obligations in this regard.

As far as we are currently aware and to the best of our knowledge, lead is the only substance in the most recently published list that is present in our (brass component) products at a concentration of more than 0.1% w/w. The raw materials used in our brass products contain up to about 4% lead to aid their machinability.

The Member States Committee (MSC) of the European Chemicals Agency (ECHA) has decided to include lead in the SVHC Candidate List.

This means that information obligations under the REACH Regulation enter into force with immediate effect. Suppliers of brass products (i.e. brass solenoid valves and or brass components) that contain more than 0.1% w/w lead are required to notify their business partners of the lead content when the product is delivered for the first time.

Whether applications for brass alloys containing lead will face further restrictions as the REACH process progresses, such as needing an authorisation for specific purposes of use, will require in-depth consultation and it is unlikely that the question will be answered this year by the ECHA.

Even if it is decided that lead requires registration and/or authorisation, there will be a transitional period until i.e. 2024. We are assuming that the authorisation would be issued by the ECHA, especially since the brasses currently available on the market and used in machining that contain lead cannot automatically be substituted using current technologies/alternatives.

We are monitoring developments with the REACH Regulation closely and will apply the necessary requirements to our products.