

Information sheet for lead (CAS 7439-92-1) on inclusion in Candidate List of Substances of Very High Concern (SVHC) in the EU for products containing >0.1% of lead



Metallic lead since June 2018 is identified as a Substance of Very High Concern (SVHC) on Candidate List following REACH regulation EU 1907/2006. EppsteinFOILS is supplying lead foils or alloy foils with a lead content above 0.1% to your company. Other substances on the candidate list are not included in our products.

If you are using our products exclusively in the intended manner according to registration, you will not be subject to any reporting obligations pursuant to Article 7(2). EppsteinFOILS as the first manufacturer of an article checks whether the identified uses of our products known to us are covered by the suppliers' registration. For this reason we kindly and urgently ask you to communicate your application to us. If intended uses are not covered and reported to us, we will report them to ECHA according to REACH Article 7(2) or arrange for our suppliers to do so. You can find registered applications for article service life here: <https://echa.europa.eu/de/registration-dossier/-/registered-dossier/16063/3/1/7>

As a supplier of articles to professional users, Article 33 (1) requires you to actively inform your customers of the presence of lead in articles or parts thereof supplied to them. This information must be communicated all along the supply chain. In the case of products for private users, Article 33 (2) requires that information on the presence of SVHC or lead in delivered articles or parts thereof will be provided on request within 45 days.

The lead content of the metal foil can easily be taken from the alloy identifier. An alloy Pb96Sn1,5Sb2,5 contains 96% lead, an alloy Sn62Pb36Ag2 contains 36% lead. The Certificate Of Analysis also states the measured lead content in the metal in the charge analysis.

Please check the uses stated in our safety data sheet (SDS) available at our homepage www.eppsteinfoils.de

Our products have to be considered as articles under chemical law (see REACH Article 3, No. 3).

Unlike chemicals, for articles there is no obligation for hazardous substance labelling or for the provision of a safety data sheet. The purpose of this information sheet is to inform you about the lead content and draw your attention to the risks for workers and for the environment associated with the possible release of lead as dust or chips during processing.

We therefore provide you with information on the safe use of our products. We provide this information to the best of our knowledge and belief, after thorough examination for accuracy and on the status of the chemical regulations at the time of August 2018.

Lead in metallic form poses health and environmental risks as soon as it becomes available to humans or other organisms. When lead is vaporized, powdered, oxidized or dissolved, there is a risk that lead ions will become available that can be absorbed through the respiratory tract or digestive system, posing a health hazard.

Lead is classified as a hazardous substance in the EU:

- Repr. 1A; H360FD: May damage fertility. Suspected of damaging the unborn child.
- Lact.; H362: May cause harm to breast-fed children.
- STOT RE 1; H372: Causes damage to the central nervous system, the blood and the kidneys through prolonged or repeated exposure

For lead-containing mixtures (alloys) the classification Repr. 1A applies from a concentration of 0.3% lead for solid metal and from 0.03% lead for powders with a particle size < 1mm.

In principle, lead and lead compounds in particular are considered harmful when inhaled or swallowed and harmful to the development of the unborn child. In the case of prolonged and repeated exposure, even to small quantities, lead has an organ-damaging effect and impairs fertility. In addition, there is a suspicion that lead is carcinogenic. Particularly noteworthy are the negative effects on the development of intelligence in children who have been shown to have a comparatively high blood lead content. Contact with lead and lead compounds in powder form or solutions containing lead should therefore be strictly avoided.

In water, lead ions are very toxic to aquatic organisms with long-term effects. Therefore any lead deposits into the environment are to be avoided.

Risk assessment

Depending on the application, special regulations must be observed when handling lead. In principle, the formation of lead dust and lead compounds must be avoided. Should this nevertheless occur, appropriate personal protective equipment (PPE) must be worn. In some EU Member States, occupational exposure limits and blood lead levels must be observed when handling lead. Directive 98/24/EC specifies the limit value for inorganic lead and its compounds as 0.15 mg/m³ in the breathing air, related to 8 hours. For lead, the TRGS 903 provides a biological limit value of 400 µg/L blood for male workers and 300 µg/L blood for female workers up to 45 years of age.

Within the scope of registration, a DNEL (derived no effect level) of 400 µg/L blood for workers and 100 µg/L blood for pregnant women and children was derived.

These values should be taken into account accordingly in the context of the activity-related risk assessment.

Protective measures

When handling lead commercially, the dangers must be kept under very good control. Please be sure to observe the legal regulations applicable to you when handling lead. The TRGS 505 contains special protective measures for activities involving lead and inorganic lead compounds.

Cleanliness, care and hygiene

You can protect yourself from the hazards of working with lead by not changing its compact form; that is to say

- do not bring lead into contact with aggressive substances (acids, alkalis)
- protect lead against corrosion
- do not grind, saw or drill into lead
- do not heat lead up to temperatures at which it could strongly oxidize or even vaporize

Strictly ensure tidiness and cleanliness at the workplace, and

- do not eat, drink, smoke or consume any other items in the workplace
- ensure good personal hygiene, especially washing hands after work, before changing activities, before breaks, eating and drinking.

PPE

- If lead dust and smoke are generated in the air, suitable respiratory protection must be provided.
- We do not generally recommend gloves for handling compact lead. If gloves are worn, e.g. to avoid injury, it should be ensured that these gloves are only used for handling lead in order to prevent lead abrasion from being carried over to other areas of activity.
- Workwear, including special cleaning, is recommended to prevent lead dust from being carried into private areas, especially if the formation of lead dust cannot be excluded.

Restrictions on use:

Restrictions on use of lead apply in many states.

Europe-wide restrictions or limit values exist for lead metal and its compounds for food, cosmetic and packaging applications, for the manufacture and use of color pigments, for consumer articles children could put in the mouth, for jewelry, toys and electrical and electronic components (see RoHS) and vehicles. Please check whether any restrictions or prohibitions apply to your product or whether any exemptions apply.

We encourage you to handle lead responsibly by

- Ensuring that leaded waste is recycled in accordance with appropriate safety standards or disposed of appropriately
- Ensuring through appropriate product design that leaded components can be dismantled and recycled.
- Refraining from applications that provide for persistence in the environment
- Avoiding its use in products for private end users.

RoHS

The product supplied by EppsteinFOILS contains lead intentionally and according to the formulation, which is considered essential for the function of the product. *So this product is not RoHS compliant.*

EppsteinFOILS confirms that the products supplied - apart from the lead content - comply with the requirements of the RoHS Directive 2011/65/EC, which regulates the content of PBB and PBDE flame retardants and Pb, Hg, Cd and Cr(VI) +6.

EppsteinFOILS would like to point out that it does not supply electronic components. The use of the product determines whether RoHS or other restrictions apply. For this reason, EppsteinFOILS cannot give a waiver regarding potential exceptions.

California Proposition 65

Lead is known to the State of California to cause cancer. Products with lead content must have a specific warning. More information: <https://www.p65warnings.ca.gov/>

For products with tin: Conflict minerals

The USA has issued the so-called Dodd-Frank-Act for the use of conflict minerals.

Conflict minerals are therefore gold, tantalum, copper, tin and others, which are mined in the Democratic Republic of Congo and the neighboring states under inhumane conditions and finance the civil war-like conflicts there.

EppsteinFOILS produces tin foil from recycled tin and other compliant sources.

EppsteinFOILS is not subject to the disclosure obligations of the SEC.

EppsteinFOILS confirms that compliance with ethical and social standards for metallic raw materials is important. For this and other reasons, metal procurement is under the direct control of the management.

Due to its company policy and compliance regulations, EppsteinFOILS feels obliged to use only raw materials whose origin has been clarified to the best of its knowledge, to refrain from the use of conflict metals and ores of dubious origin and to demand proof of this from its relevant suppliers.

EppsteinFOILS has evidence from the relevant suppliers that their sources do not use conflict ores or metals and has no reason to doubt this.

EppsteinFOILS will be happy to answer any questions you may have.



i.V. Klaus Schwinn
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as of 21st of January, 2019

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