

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



EppsteinFOILS is supplying lead foils or alloy foils with a lead content above 0.1% to your company. Other substances on the Candidate List of January 21<sup>st</sup> 2025 for Substance of Very High Concern (SVHC) according to REACH regulation EU 1907/2006 are not included in our products.

Since 5 January 2021, all companies supplying articles with SVHC *in the EU* are obligated to submit information for SVHC into the SCIP database via IUCLID or IT-tools like Bomcheck. This is for any products they supply which include articles that contain REACH Candidate List substances above 0.1%, with possible subsequent enforcement by Member State regulatory authorities. "ECHA Substances of Concern in Products" (SCIP) reporting is the database for information on Substances of Concern in articles as such or in complex objects (products) established under the 2018 revision to the Waste Framework Directive.

The reporting requirement applies to all companies in the supply chain of products for the EU including the original article supplier, suppliers of sub-assemblies and assemblies that contain affected articles, suppliers of finished products that contain affected articles, and resellers and distributors who supply the finished product to retailers.

EppsteinFOILS has submitted typical groups of products and their application and our sales will communicate the relevant 36 figured SCIP number together with shipment details. The SCIP number is depending on application. For this reason we kindly and urgently ask you to communicate your application to us to be able to report uses which are not covered to ECHA according to REACH Article 7(2) or arrange for our suppliers to do so. You may find registered applications for article service life via ECHA homepage <https://echa.europa.eu>. 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 together with the SCIP number of your product. 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.

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. Supplying no dangerous chemical mixtures EppsteinFOILS did not notify an UFI (Unique Formula Identifier) for its articles at ECHA. In case you are using our articles as a chemical (e.g. solder, for analysis) in the EU EppsteinFOILS will be happy to help you. Please check the uses stated in our safety data sheet (SDS) available at our sales.

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.
- Aquat. Chron. 1; H410; Very toxic to aquatic life with longlasting effects

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/m<sup>3</sup> in the breathing air, related to 8 hours. For lead other national thresholds apply, e.g. the German TRGS 903 provides a biological limit value of 150 µg/L blood.

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 some phthalate plasticizers, 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 which are existing for specific applications.

## **Conflict minerals**

for products with tin

The USA and EU have issued laws concerning the use of conflict minerals. e.g. gold, tantalum, tungsten, tin and other minerals extracted in defined regions and states, under conditions unfit for human beings, and then used in financing the conflicts akin to civil wars existing in that region.

EppsteinFOILS produces tin and alloy foils from recycling tin and is not subject to the SEC's disclosure obligations. EppsteinFOILS confirms that it is important to observe ethical and social standards with regard to obtaining metallic raw materials. For this reason and others, the sourcing of metal is placed under the direct supervision of the company management.

Because of its company policy and compliance rulings, EppsteinFOILS sees itself as being obliged both to use only raw materials the provenance of which has been clarified according to the company's best knowledge and belief, to abstain from the use of conflict metals and conflict ores, and also to demand proof of this from its relevant suppliers.

EppsteinFOILS has corresponding proof from the relevant suppliers that their sources use no conflict ores or conflict metals and has no basis for doubting the veracity of this proof.

## **PFAS**

PFAS are not used for the products supplied.

## **TSCA**

Apart from lead metal EppsteinFOILS products do not contain substances as prohibited by TSCA per May 8<sup>th</sup> 2021.

## **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/>

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



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