



Gibbs Wire & Steel  
10 Metals Drive  
Southington, CT 06489  
Phone: (860) 621 - 0121  
Email: [vern@ gibbswire.com](mailto:vern@ gibbswire.com)

7/18/2019

To: Valued Customers

From: Gibbs

Subject: REACH Compliance Regulation (EC) No. 1907/2006

Dear Valued Customer,

In 2006, the EU passed the above reference regulation, known as REACH, concerning the production and use of chemical substances. Under REACH, all companies manufacturing or importing chemical substances into the European Union in quantities of one ton or more need to register the substances. It was effective June 2007 with a phased in implementation.

Gibbs® is a distributor of metal products, providing value added services of slitting, edging and oscillating. Under our reading of the regulation and the additional communications from the European Chemicals Agency (ECHA), we believe that the wire and strip products we sell do not need to be registered in their existing form. Nor do we have to register based on the fact that these products contain elements such as nickel, chromium, carbon, etc, of which we are not releasing.<sup>1</sup>

In communication with our vendors, we have been advised that the products they supply to us do not contain any significant amounts of 201 chemical compounds referenced on the List of Substances of Very High Concern (SVHC) through its **latest release on 7/16/2019**. The list of current candidate SVHC can be found at:

<https://echa.europa.eu/candidate-list-table>

Thus, as of the date on this statement, we believe the material supplied to you from Gibbs® is in full compliance with this regulation. We will continue to monitor and update the REACH requirements in conjunction with our vendors.

Sincerely,  
Vern Guetens  
Corporate Director of Quality / CT Quality Manager

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<sup>1</sup> We are relying in part on communications between the European Confederation of Iron and Steel Industries (EUROFER) and the ECHA. References to these communications as well as common REACH questions and answers are available on the EUROFER website: [www.eurofer.org](http://www.eurofer.org).